

Modern Slavery Statement 2020

The Kraft Heinz Company and its direct and indirect subsidiaries including H.J. Heinz Company Limited, H.J. Heinz Foods UK Limited and H.J. Heinz Manufacturing UK Limited (collectively “Kraft Heinz”) continues its commitment to enhancing the quality of people’s lives through sustainability, health and wellness and social responsibility. We believe the protection of human rights is fundamental, good business, and we believe that we have both the ability and the responsibility to drive positive change through our global work.

In 2019 Kraft Heinz released a new Global Human Rights Policy which can be accessed on our website [here](#).

Our Global Human Rights Policy is guided by internationally-recognised standards, including the [United Nations Guiding Principles on Business and Human Rights](#), the [International Bill of Human Rights](#) and the principles set forth in the [International Labour Organization’s Declaration on Fundamental Principles and Rights at Work](#).

In such Policy Kraft Heinz requires all Kraft Heinz employees and related entities, suppliers and business partners to strictly adhere to our human rights standards, which, in summary:

- Prohibit child and underage employment
- Prohibit trafficking, forced or involuntary prison labour
- Prohibit all and any forms of abuse, bribery, harassment and discrimination
- Recognise and respect the rights of freedom of association and collective bargaining
- Recognise and respect fair, legal and equitable work timeframes, working conditions (including health and safety) and wages
- Recognise land rights, natural resources and ensure all workers’ rights to clean water and adequate sanitation facilities
- Require all labour recruitment and employment procedures to be carried out in a legal and ethical manner

We are committed to respecting human rights in our own operations and throughout our global value chain. Kraft Heinz continues to place the utmost value on an ethical and transparent supply chain, and is dedicated to the eradication of slavery and human trafficking. Kraft Heinz demands that all business partners demonstrate a clear commitment to protecting the rights of workers worldwide and does not tolerate the use of forced labour.

Kraft Heinz continues to partner with thousands of suppliers globally that are similarly committed to ensuring that there is no modern slavery within the Kraft Heinz supply chain. Kraft Heinz also reserves the right to complete due diligence and audits of our suppliers through our supplier selection and contracting procedures, in order to ensure compliance with our policies and local laws. Moreover, we continuously evaluate the suppliers we use and throughout our own operations to ensure our global value chain is operating in an ethical manner, one of the company’s core principles.

Supply Chains

Our supply chains are primarily focused on the sourcing, warehousing and transporting of the raw materials, ingredients and packaging required for the manufacture of our food and beverage

products globally. All business partners, including but not limited to suppliers of raw materials, ingredients and packaging, are required to demonstrate a clear commitment to protecting the rights of workers. We seek to respect human rights across our global operations and supply chain, which is represented by hundreds of thousands of stakeholders, including but not limited to employees, suppliers, contractors, co-packers/external manufacturers, joint venture partners and rightsholders such as the following: foreign and migrant workers, women, children, indigenous populations, minorities and people with disabilities. We are committed to working with our business partners to respect human rights and expect them to adhere to the internationally recognised standards outlined in our Policy. Specifically, suppliers are required to adhere to our Supplier Guiding Principles which can be accessed on our website [here](#). Upon request, a supplier must certify its compliance with all such principles.

Policies on Slavery and Anti-Trafficking

Internal Accountability

Kraft Heinz is also committed to ensuring that there is no slavery or human trafficking in any part of our business, including our supply chain. Each Kraft Heinz employee is expected to conduct business legally and ethically and comply with certain established company standards, including but not limited to the prohibition of forced labour and the employment of anyone under the local legal working age. All such standards are outlined in the Employee Code of Conduct which can be accessed from our website [here](#). Failure to meet the Kraft Heinz standards on forced labour or minimum age requirements is a violation of corporate policy and may be against the law. Violators are subject to disciplinary action, up to and including termination of employment as well as potential legal consequences.

Training

The most recent version of the Kraft Heinz Employee Code of Conduct is accessible to all employees globally. Kraft Heinz utilises a modular training programme for the various components of the Employee Code of Conduct, meaning the focus of the trainings is established in accordance with the employee's function within the company.

Kraft Heinz has further enhanced the rigour and extent of training being provided to its employees, specifically with regard to those in roles that are more readily exposed to scenarios where forced labour may arise. This targeted and pro-active practice furthers Kraft Heinz's commitment to protecting the rights of workers worldwide, meaning we are better poised than ever to identify actual or potential human rights violations in our supply chain. The increased levels of training provided by Kraft Heinz help us manage human rights protection in our business.

Certification by Direct Suppliers

Kraft Heinz's standard purchasing contracts require suppliers to comply with all laws and regulations applicable to the fulfilment of its duties under the contract and to adhere to the principles contained in the Supplier Guiding Principles. In addition, suppliers are required to certify their compliance with the Supplier Guiding Principles at the request of Kraft Heinz and to permit Kraft Heinz and/or its designated agents (including any third parties) to engage in monitoring activities, including on-site inspections where appropriate. If the supplier is unable to

resolve any issues, Kraft Heinz reserves the right to take additional action against the supplier, including but not limited to termination of the business relationship.

Verification and Due Diligence Processes for Slavery and Anti-trafficking

Kraft Heinz believes a critical aspect of a resilient, effective Anti-Slavery and Anti-Trafficking approach sits within the due diligence process. We undertake both internal and external practices to assess potential negative human rights impacts in our business operations and global supply chain. All material issues are addressed as part of our internal ESG Global Steering Group. In addition, our Executive Leadership Team as well as our Board of Governors reviews our overarching corporate responsibility strategy and practices on at least an annual basis.

Assessment – Our due diligence efforts in 2019 included conducting risk assessments with third-party assistance to identify potential and/or actual negative human rights risks. This included an evaluation of geographical, economic and social criteria to determine points in our value chain where risk is highest, and where we could make the greatest impact.

Management – This risk assessment influences our management programmes and enables its integration into human rights risk management procedures and mitigation practices. It also allows for continuous engagement with relevant stakeholders and fosters tracking of the overall effectiveness of our risk management programmes.

Kraft Heinz is committed to addressing any adverse human rights impacts which we have potentially caused or to which we have contributed, and expect our suppliers, business partners and other relevant stakeholders to likewise ameliorate. Reports from any party received through our Grievance Mechanism or any other medium, are reviewed within 24 hours by the Chief Ethics & Compliance Officer during a preliminary assessment, and further addressed by executive leadership as appropriate. We safeguard anonymous reports and do not tolerate retaliation of any kind. We have not impeded and will not impede the access to state-based judicial or non-judicial mechanisms for any persons raising allegations through our Grievance Mechanism.

Communications – Kraft Heinz actively communicates the human rights guiding principles and expectations set out in our Global Human Rights Policy to employees, suppliers, business partners and other stakeholders via both disclosure and engagement. The Policy is available internally and publicly via the Kraft Heinz Corporate Website [here](#). When needed, local translation is provided.

Grievance Mechanisms - Kraft Heinz provides several ways for employees, suppliers, business partners and other stakeholders to raise concerns or complaints. This includes the reporting of potential misconduct to managers, Human Resource professionals, the Legal Department and the Ethics & Compliance team, and our confidential Ethics & Compliance Hotline. The Hotline is open to all stakeholders, including rightsholders, is maintained by a third-party provider and has multilingual staff available 24 hours a day. Reports can be made via country-specific toll-free phone numbers, or online.

Measuring our effectiveness

We will continue to update our policies and procedures applicable to our supply chain as Kraft Heinz, our brands and our supply chain evolves.

We are on a journey of continuous improvement, constantly challenging the status quo. We are dedicated to doing the right thing. We lead with ethics and integrity. We will always strive to do right by our customers, partners, suppliers and the communities we serve. At Kraft Heinz we actively care about social responsibility and our environment, and seek to create high-quality, responsibly manufactured products.

Approved and signed by: *Christine Page*
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