

 GLOBAL CORPORATE SOCIAL RESPONSIBILITY POLICIES	CATEGORY CORPORATE SOCIAL RESPONSIBILITY, ETHICS & COMPLIANCE	DATE OF ISSUE 05/15/2019
TITLE GLOBAL HUMAN RIGHTS POLICY		

Our Commitment

At The Kraft Heinz Company (“Kraft Heinz”), we believe in living our Vision – *To Be the Best Food Company, Growing a Better World* – in earnest, every day. From our quality controls to the relationships we have with our growers and suppliers, we’re committed to responsible business practices extending to every facet of our business, and continuous evaluation to identify better and more sustainable ways to operate.

In support of our Vision, we are committed to respecting human rights in our own operations and throughout our global value chain. We believe the protection of human rights is fundamental to good business, and believe we have both the ability and responsibility to drive positive change through our global work.

Our Global Human Rights Policy (this “Policy”) is guided by internationally-recognized 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.

Human Rights Guiding Principles

Kraft Heinz adheres to the following principles, and expects the same from its suppliers and other business partners:

- Minimum Age for Employment – we prohibit the employment of anyone under the legal working age as defined by local law and/or the principles of this Policy, whichever is higher. We do not tolerate the use of child labor
- Forced Labor – we do not tolerate the use of forced or involuntary prison labor
- Abuse and Harassment – we prohibit the use of corporal punishment or other forms of physical or sexual harassment or abuse
- Discrimination – we prohibit discrimination on the basis of inequalities including race, ethnicity, sex, language, religion, political or other opinion, national or social origin, property and birth or other legally-protected status (such as sexual orientation or health status)
- Freedom of Association – we recognize and respect the rights to freedom of association and collective bargaining
- Work Hours, Work Week and Payment of Wages – we provide fair and equitable wages and other employment conditions in accordance with applicable local laws and/or the principles of this Policy, whichever is higher

- Health and Safety – we require working conditions in compliance with all applicable laws regarding worker health and safety
- Bribery – we prohibit improper payments in the conduct of our business and expect full compliance with the U.S. Foreign Corrupt Practice Act, U.K. Bribery Act, Canada Corruption of Foreign Public Officials Act and all other applicable anti-corruption laws
- Recruitment of Workers – we require labor recruitment and employment procedures to be carried out in a legal, ethical manner
- Water and Sanitation – we aim to understand and, where relevant, address water access risk, respecting everyone’s right to safe, accessible and affordable water as well as to clean sanitation facilities
- Land Rights – we adhere to the principle of free, prior and informed consent (FPIC). We follow all applicable laws relating to the rights of land and natural resources

Scope

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, 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-recognized standards outlined in this Policy.

We require compliance with all applicable laws and regulations. We understand there are instances where local law and the human rights standards outlined in this Policy do not intersect; our expectation is that human rights are respected within our business operations regardless. In such cases, we will seek to follow the higher standard.

Administrative and Governance

This Policy and all statements herein – including any recommended changes or updates – are (or, as applicable, must be) approved by the Kraft Heinz Board of Directors and Chief Executive Officer, Bernardo Hees. Relevant members of the Kraft Heinz Executive Management team oversee implementation of this Policy.

A Global Steering Group – including the Head of Corporate Social Responsibility, the Chief Procurement Officer and the Chief Ethics and Compliance Officer – monitors compliance with this Policy and developments within the industry. They are also responsible for day-to-day monitoring, supervising, administration and updating of this Policy. The senior leaders within this Global Steering Group have performance incentives linked to successful implementation and governance of this Policy.

Human Rights Due Diligence

We believe a critical aspect of a resilient, effective human rights 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.

- Assessment – Our efforts include conducting a risk assessment to identify potential and actual negative human rights impacts. This includes evaluation of geographical, economic and social criteria to determine points in our value chain where risk is highest, and where we can make the greatest impact
- Management – We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk, including integration into day-to-day operations, relevant internal and external risk management systems, training protocols and the implementation of several global policies such as the Kraft Heinz Employee Code of Conduct, Supplier Guiding Principles and Global Palm Oil Policy

We are committed to addressing any adverse human rights impacts which we have caused or to which we have contributed, and expect our suppliers, business partners and other relevant stakeholders to do the same. Reports from any party received through our Grievance Mechanism (described below) 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 do not tolerate retaliation and anonymity is guaranteed. We have not and will not impede access to state-based judicial or non-judicial mechanisms for any persons raising allegations through our Grievance Mechanism

- Tracking – We track the effectiveness of our management of negative human rights impacts through the monitoring of and engagement with our suppliers, business partners and other relevant stakeholders [regarding compliance with the Human Rights Guiding Principles set forth in this Policy]. We will provide biennial public disclosure on our effectiveness
- Communications – We actively communicate the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement. The Policy is public via the Kraft Heinz Corporate Website and within our internal Kraft Heinz Policy Center, housed on an intranet platform. When needed, local translation is provided
- Grievance Mechanisms – We provide 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 Resources 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.