

KraftHeinz	Date of Issue: 16/09/2026	Supersedes Issue Dated: 26/09/2019
Title: Global Human Rights Policy		

1. POLICY OVERVIEW & PURPOSE

- Policy Owner: Global Sustainability
- Approver: Global Chief Procurement & Supply Chain Officer
- Version: 2.0

At The Kraft Heinz Company (together with its global subsidiaries, as applicable, “Kraft Heinz”), we are committed to extending responsible business practices across every facet of our business and continuously evaluating more sustainable ways to operate.

Kraft Heinz is a signatory to the UN Global Compact, and this Global Human Rights Policy (this “Policy”) is guided by internationally-recognized standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, as well as the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

2. SCOPE & APPLICABILITY

2.1 Who this applies to

This Policy applies to all Kraft Heinz operations, brands, subsidiaries, joint ventures, contract manufacturers, and suppliers.

Our efforts begin within our operations and with our direct employees, but we recognize our responsibility extends throughout our value chain and we partner with suppliers that respect and protect the rights of their employees and workers in the extended supply chain.

Where local law and the human rights standards outlined in this Policy do not align, we expect human rights to be respected and applicable laws and standards to be complied with across our operations and value chain. In such cases, applicable local laws must be followed, and where possible, we seek to align with the higher standard.

3. COMMITMENTS

We are committed to respecting human rights throughout our operations and value chain, prioritizing areas where we have the most control and influence and where we can have the greatest impact.

We continuously evaluate and strengthen our approach to human rights and expect our suppliers to do the same.

In alignment with the UNGPs, we enhance and support human rights through the following three approaches:

- Conducting due diligence to identify relevant adverse impacts on human rights
- Ensuring effective mechanisms are in place throughout our operations and supply chain for remediation and root-cause prevention
- Advancing livelihoods and extending our impact to the communities where we operate and source

KraftHeinz	Date of Issue: 16/09/2026	Supersedes Issue Dated: 26/09/2019
Title: Global Human Rights Policy		

4. IMPLEMENTATION & DUE DILIGENCE APPROACH

4.1 Human Rights Principles

We pay particular attention to vulnerable workers, such as migrant workers, children, women, minority groups and indigenous communities. We require compliance with all applicable laws and regulations. Our minimum standards are outlined below and apply across our operations and our supplier base.

The following human rights topics are also embedded within Kraft Heinz's Employee Code of Conduct and Supplier Guiding Principles and apply to Kraft Heinz employees, suppliers and our business partners. The topics are structured as:

- **Mandatory Requirements:** Outline the requirements suppliers must meet
- **Expected Practices:** Build on the mandatory requirements to ensure best practice systems are in place for the protection of workers
- **Management Systems:** The processes related to ensuring the effective implementation of the mandatory requirements

We recognize that effective dialogue with internal and external stakeholders is an integral part of our human rights approach. Kraft Heinz will:

- Engage directly with suppliers on implementation and compliance
- Support collective action with local governments and NGOs in priority regions
- Collaborate with third-party verifiers, auditors, and technology platforms

Topic Area	Mandatory Requirement	Expected Practices	Management System
<u>Child Labor</u>	Kraft Heinz prohibits the use of all forms of child labor. Suppliers must adhere to all applicable laws and regulations regarding minimum working age. They will not directly, or indirectly through their contractors or subcontractors, use child labor, and must have policies in place that prohibit the use of child labor. Suppliers will comply with the minimum employment age limit defined by applicable law or by ILO Convention 138, whichever is more restrictive. The ILO Convention 138 minimum employment age is the local mandatory schooling age, but not less than 15 years of age. Children above the minimum age of employment should not be exposed to undue physical risks that can harm physical, mental, or emotional development. No person under the age of eighteen shall be employed at night or in hazardous conditions (e.g., through operating heavy machinery or handling hazardous chemicals).	Wider support is provided for workers' families and their surrounding communities to improve access to education. This may include collaboration with local governments on school provision, support for school-related costs and providing vocational training.	1) A policy is in place which specifies the minimum age for all workers (both directly recruited and those recruited through an agency) and the remediation process to follow if an incident of child labor is identified. This must cover care, education, and income replacement. 2) Age verification processes are in place, including appropriate documentation and record-keeping systems.

Title: Global Human Rights Policy

	When an issue of child labor is identified, the child must be removed from the field of work and put into a protected remediation plan, aligned with guidance from the ILO (International Labour Organization), prioritizing the best interest, safety and wellbeing of the child. A child's removal from work must not result in harm or loss of access to essential needs. The root causes of the issue must be investigated, and corrective actions must be followed through to prevent recurrence (including in contractors/subcontractors), and evidence of remediation and ongoing monitoring must be documented.		
<u>Forced or Involuntary Labor</u>	Kraft Heinz prohibits the use of all forms of forced, bonded, indentured, or compulsory labor, including prison labor, indentured labor, military labor, slave labor or any form of human trafficking. All workers must work under voluntary conditions and with the freedom to terminate their employment at any time. Contracts: Employers must provide written employment contracts, entered into voluntarily, that set out the fundamental terms of employment (e.g., wages, hours, rights and responsibilities) in a language the employee understands. Migrant workers: Additional consideration should be given to protecting migrant workers – people working outside their country of origin – against vulnerabilities towards human rights abuses and exploitation. Suppliers are required to implement human resources management systems that address risks to migrant workers.	Workers are trained on forced labor risks to increase their participation in risk prevention and mitigation activities.	1) Hiring policies outline that workers are entering into employment freely and are not prevented from leaving. 2) Workers relocating for work are made aware of their rights in a language they understand. 3) Workers have freedom of movement and are not confined to a facility's premises, including (where relevant) accommodation provided and transportation to and from the place of work.
<u>Responsible Recruitment</u>	Suppliers shall uphold professional, ethical, safe, secure, and responsible recruitment practices with the intention of preventing unnecessary risk exposure, exploitation, and unreasonable financial bonds being imposed on recruits. Kraft Heinz abides by the 'The Employer Pays Principle' commitment. As such, suppliers must ensure that individual workers and job seekers are not charged recruitment fees, and that all recruitment-related costs of recruitment should be borne, not by the worker, but by the employer.	Monitoring and selection of recruitment agencies or labor brokers is in place according to their management system controls of responsible recruitment.	Policies are in place to identify, prevent and remediate any potential cases of recruitment fees paid by workers.

Title: Global Human Rights Policy

<u>Working Hours & Wages</u>	Suppliers must comply with all applicable laws and regulations regarding wages, overtime pay, benefits, leave, and maximum working hours. Workers should receive fair and equitable pay. Suppliers will also comply with laws with respect to governing regular and overtime working hours and ensure that overtime work remains voluntary and compensated fairly. Pay: Workers must receive a pay slip for each pay period that clearly details the amount for wages earned, including overtime hours, as well as any benefits or agreed-upon deductions. Where workers are paid on a piece-rate or volume output basis, the pay rates must allow the workers to earn at least the equivalent of the applicable legal minimum wage or collective agreement wage, whichever is higher. All deductions (beyond those legally mandated) must be made only with the worker's written consent and in a language the worker understands. Rest periods: Where not otherwise required by law, suppliers should provide at least one consecutive 24-hour period of rest in each seven-day period. Regular and working hours should not exceed 48 hours per working week, or 60 hours per week including overtime. Workers are entitled to reasonable rest periods, annual leave, and paid holidays with pay.	1) Workers are consulted on their working hours and working time arrangements to allow them to be able to attend to family and personal needs, such as time off for medical appointments, without prosecution. 2) Suppliers have completed a Living Wage benchmark gap analysis to assess the difference between actual earnings and the income required to achieve a decent standard of living. Where a gap is identified, a time-bound action plan is in place to address and close the gap.	1) Policies are in place covering regular working hours, wages, and compensation, and are communicated to workers in their native language. 2) Mechanisms are in place to record and monitor working hours and overtime for all workers. 3) Records are maintained demonstrating that workers are paid accurately and on-time, including compensation for overtime hours worked.
<u>Non-Discrimination</u>	Suppliers shall not discriminate in hiring, contracting, or employment practices including, without limitation, compensation, promotion, discipline, termination, and retirement. Suppliers must not discriminate based on race, age, role, gender, gender identity, color, ethnicity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership, and/or political views, or will suppliers discriminate based on any other condition or characteristic that is protected by applicable law or regulation. Health screenings that could lead to discrimination, such as pregnancy tests, are prohibited. In instances where any legal employee health testing is legally required, suppliers must ensure that the results are not used to terminate employment or otherwise discriminate against workers unfairly.	1) Testing is conducted to review the effectiveness of training conducted on non-discrimination policies. 2) Targets are established to support workers most at risk of discrimination, including under-represented communities, women, and people with disabilities.	1) A policy is in place that prohibits discrimination in any form. 2) Communication and training on these policies is provided to all workers and management. 3) Human resources decisions are objective and transparent, with procedures in place to prevent discrimination.

Title: Global Human Rights Policy

<u>Freedom of Association & Collective Bargaining</u>	Suppliers shall recognize and respect each worker's freedom of association and rights to engage in collective bargaining. This includes the right to join a trade union or equivalent workers' organization and requires suppliers to provide workers' representatives with appropriate facilities to assist in developing collective bargaining agreements. Suppliers must respect these rights by maintaining a professional environment free from fear of reprisal, intimidation or harassment.	Worker representatives are engaged to provide input into the development of new policies and procedures, such as training programs.	1) Policies are in place relating to freedom of association and collective bargaining that clarify a worker's choice to form or join a trade union. 2) Regular training is conducted on workers' rights and the ability to bargain collectively (including consultation and negotiation).
<u>Grievance Mechanisms</u>	Suppliers are expected to maintain an accessible, trusted, confidential, and fair grievance mechanism, supported by suitable governance, to provide remedy for employees and local communities and to ensure timely handling of complaints. Suppliers must communicate the mechanism to all employees and their representatives.	1) Data on the handling of grievances is maintained in order to be able to review the effectiveness of the mechanism. 2) Themes, patterns and root-causes of complaints and grievances are reviewed to make effective operational improvements. 3) Suppliers' grievance mechanism is widely communicated and accessible both to employees and workers in the supply chain.	1) A clear and documented grievance process exists for raising and addressing grievances confidentially ensures confidentiality. 2) A policy is set to protect workers and whistleblowers who raise grievances. 3) All employees responsible for handling grievances are trained on the policy and associated procedures.

Title: Global Human Rights Policy

<u>Land Rights</u>	Suppliers must respect the land rights of women, indigenous people, and local communities impacted by their operations, and suppliers must adhere to the Food and Agriculture Organization of the United Nations' principle of Free, Prior, and Informed Consent in their sourcing practices. Suppliers shall not engage in any form of land grabbing. Kraft Heinz expects all suppliers to adhere to laws and regulations relating to land use rights, including without limitation, having proper land use permits in place (e.g., for farming, manufacturing or any other industrial use) and having permission for the use of groundwater or other water sources, such as nearby rivers or lakes.		1) There are written policies respecting the land rights of all legitimate land tenure holders impacted by the suppliers' operations. 2) Any impact assessment carried out is broken down by gender, nationality or tribe/caste.
<u>Gender Equality</u>	We expect our suppliers to protect the rights of women and to address the multiple dimensions of gender inequality. Suppliers must eliminate discrimination against women by ensuring equal pay for equal work and by providing equal opportunities for recruitment, promotion, and training. Suppliers must also identify and remove health and safety hazards that disproportionately affect women workers and producers.		Policies and processes are in place to protect gender equality (e.g., recruitment, pay, promotion, termination, and parental leave).
<u>Safe Working Conditions</u>	Suppliers must provide a safe and healthy working environment for all employees, in compliance with applicable laws and internationally recognized standards. This includes identifying and mitigating workplace hazards, maintaining equipment and facilities in safe condition, providing appropriate personal protective equipment and timely medical care, and ensuring access to clean water, sanitation, adequate lighting and ventilation. Suppliers must implement emergency preparedness and response plans, conduct regular risk assessments, safety training and inspections, and promptly remediate identified hazards. Workers must be able to raise safety concerns through accessible, confidential channels without fear of retaliation. See further detailed information in the following section covering Health and Safety.	1) Company targets are set to reduce the number of workplace accidents. 2) Employees are encouraged and incentivized to promote good health and safety practices that support both mental and physical wellbeing.	1) Health and safety policy is in place and communicated throughout the organization to employees and visitors. 2) Regular health and safety training is conducted to all workers including contractors. 3) A health and safety committee has been established, with a senior member of management appointed to ensure safety plans are effective at site level.

KraftHeinz	Date of Issue: 16/09/2026	Supersedes Issue Dated: 26/09/2019
Title: Global Human Rights Policy		

<u>Harassment</u>	Workers must be treated with dignity and respect. Suppliers must strictly prohibit any form of harassment, intimidation, bullying, or abuse of any employee or worker within the supply chain. This includes threats of physical punishment or disciplinary action, as well as physical, sexual, verbal, racial, or any other form of abuse or harassment.	Programs are implemented to enhance safety for women and to prevent and reduce gender-based violence both within the suppliers operations and surrounding communities. Support is available to all workers to help them understand, report, and manage instances of harassment.	1) Policies in place to prohibit any form of harassment or abuse. 2) Regular training is provided on how to recognize and prevent harassment. 3) Written disciplinary procedures are communicated and explained to all workers, and records are documented for the duration applicable by law.
-------------------	--	---	--

4.2. Strategy and Implementation Plan – Operations

To promote the adoption and enforcement of this Human Rights Policy, Kraft Heinz employs a multi-layered approach, including the following actions:

Kraft Heinz Operations

Our human resources and leadership teams uphold strong standards related to labor practices, workplace health and safety, and business ethics within our own operations. Each site completes an annual, rigorous self-assessment to identify, prevent, and proactively mitigate risks. Employees are encouraged to report concerns through accessible and confidential grievance channels; reports are investigated promptly, remediation is provided where breaches are found, and no retaliation is tolerated. Our Ethics & Compliance team oversees investigations and corrective actions to ensure accountability and continuous improvement.

Training and Raising of Awareness

Kraft Heinz provides training and learning materials on a regular basis on this Policy, as well as on human rights best practices, to cross-functional team members. Ongoing engagement and training, including internal seminars with suppliers, support a shared understanding of this Policy.

4.3. Strategy and Implementation Plan – Supply Chain

We have due diligence processes in place to assess, address, and transparently report on actual and potential human rights risks across our value chain, in alignment with the UNGPs.

KraftHeinz	Date of Issue: 16/09/2026	Supersedes Issue Dated: 26/09/2019
Title: Global Human Rights Policy		

Risk Assessment

All suppliers are assessed for risk using third-party country and sector risk data based on the product or service they provide, the locations of their supplying sites, and the level of spend in line with the contract threshold for the region. This prioritization criteria allows us to prioritize further due diligence requirements, as outlined below.

Supplier Audits

To support due diligence on human rights standards across our global supply chain, we utilize third-party audits to verify working conditions. These audits play a critical role in ensuring transparency, supporting continuous improvement, and maintaining alignment with best practices.

Audits of supplier sites include labor and human rights topics. Where adverse human rights impacts are identified, we work with suppliers to develop and implement appropriate remediation and mitigation measures.

4.4 Supplier Contracts

Adherence to this Policy is required by our standard terms and conditions, as described in our [Supplier Guiding Principles](#). If we believe any area of this Policy has been breached, we will work with our suppliers to remedy the non-compliance until a resolution is found.

4.5 Supplier Partnerships

Our suppliers are key partners in ensuring the standards set out in this Policy are met, and in turn, cascaded throughout the value chain. Where human rights impacts are identified, we are committed to mitigating, and, where appropriate, remediating those impacts through to a resolution. Suppliers are expected to maintain an effective grievance mechanism that enables workers to anonymously report any incidents of human rights breaches through to a resolution, in line with UNGP best practices.

4.6. Remediation and Grievances

We are committed to providing or supporting remediation when we become aware of adverse human rights impacts within our value chain. When an issue is identified, action must be taken immediately to stop any actual or potential harm, ensuring affected individuals are safe. Remediation must be addressed through a time-bound corrective action plan, with remedies appropriate to the impact (including prevention of retaliation), root causes addressed to prevent recurrence, and documentation maintained as evidence of implementation and effectiveness for verification.

All Kraft Heinz employees and external stakeholders may raise concerns and seek remedy through our Ethics & Compliance Helpline at www.KraftHeinzEthics.com. Employees who become aware of potential concerns are expected to report them and are trained in how to do so. The Helpline is managed by an independent third party to ensure confidentiality of the reported concern and to protect individuals from retaliation. Grievances are reviewed and managed by our Ethics & Compliance team, which supports each case through an assessment and resolution, as appropriate.

KraftHeinz	Date of Issue: 16/09/2026	Supersedes Issue Dated: 26/09/2019
Title: Global Human Rights Policy		

5. GOVERNANCE, REPORTING & CONTINUOUS IMPROVEMENT

5.1 Governance, Ownership & Oversight

This Policy is approved by the Global Chief Procurement & Supply Chain Officer. Oversight is provided by a cross-functional committee chaired by the Global Director of Sustainability.

A Human Rights Working Group with representatives from each of Kraft Heinz's Regions and coordinated by Global Sustainability, reports on progress to the cross-functional committee. The responsibilities of the Working Group include:

- Ensuring effective implementation of this Policy across global operations
- Identifying and managing risk triggers, along with escalation protocols
- Monitoring global regulatory developments and supplier grievance trends
- Consulting with subject matter experts and industry organizations

5.2 Continuous improvement and Policy Review

Kraft Heinz is committed to continuous improvement in the implementation of this Policy. This Policy is formally reviewed at least every two years, or earlier if triggered by:

- Significant regulatory changes
- Evolving risk exposure or supply chain developments
- Updates to governance or internal processes
- Findings from performance monitoring, supplier engagement, and grievance trends are used to inform updates to this Policy and associated implementation approaches. Adjustments are made as necessary based on materiality, risk exposure, and evolving regulatory and stakeholder landscapes.

5.3 Performance Management

Kraft Heinz is committed to monitoring the implementation of this Policy through robust performance management systems. Progress is tracked using internal metrics and dashboards aligned with regulatory requirements and supplier human rights standards.

5.4. Stakeholder Engagement

We recognize that effective dialogue with internal and external stakeholders is an integral part of our human rights approach. Kraft Heinz will:

- Engage directly with suppliers on implementation and compliance
- Support collective action with local governments and NGOs in priority regions
- Collaborate with third-party verifiers, auditors, and technology platforms

KraftHeinz	Date of Issue: 16/09/2026	Supersedes Issue Dated: 26/09/2019
Title: Global Human Rights Policy		

6. ALIGNMENT AND DEFINITIONS

Human Rights is closely linked to other Kraft Heinz policies, including the Global Deforestation & Conversion Free Policy and our Supplier Guiding Principles. We expect all suppliers to safeguard human rights and to do so in compliance with these policies:

- [Supplier Guiding Principles](#)
- [Employee Code of Conduct](#)
- [Global Health, Safety & Environment Policy](#)
- [Global No Deforestation Sourcing Policy](#)

6.1 Definitions and Glossary

Term	Definition
UN Global Compact	The world's largest corporate sustainability initiative, launched to encourage businesses and organizations to adopt socially responsible and sustainable practices. It is based on Ten Principles covering Human Rights, Labor Standards, Environment, and Anti-Corruption, derived from international agreements.
United Nations Guiding Principles on Business and Human Rights	A global framework for preventing and addressing the adverse impacts of business activities on human rights. They are built on three pillars: Protect, which emphasizes the state's duty to safeguard human rights; Respect, which highlights the corporate responsibility to respect human rights; and Remedy, which ensures access to effective grievance mechanisms for those affected.
International Bill of Human Rights	Universal principles that guide nations in promoting and protecting human dignity, justice, and equality worldwide. The International Bill of Human Rights is a collective term for the Universal Declaration of Human Rights and the two Covenants that further elaborate on its principles.
OECD Guidelines for Multinational Enterprises	A set of government-backed recommendations aimed at promoting responsible business conduct among multinational enterprises operating across borders.
International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work	A framework that commits ILO member states to respect and promote core labor standards, regardless of their level of economic development. These principles include freedom of association and the right to collective bargaining, the elimination of forced or compulsory labor, the abolition of child labor, and the elimination of discrimination in respect of employment and occupation.
Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy	Guidelines to governments, employers, workers, and multinational enterprises on promoting socially responsible practices in the workplace. It addresses key areas such as employment, training, working conditions, and industrial relations, emphasizing the importance of respecting international labor standards and fostering sustainable development.
Corrective Action Plan (CAP)	A time-bound plan developed in response to non-compliance, outlining actions, responsibilities, and deadlines for resolution.

KraftHeinz	Date of Issue: 16/09/2026	Supersedes Issue Dated: 26/09/2019
Title: Global Human Rights Policy		

Due Diligence	The process of identifying, assessing, and mitigating risks across the supply chain.
Grievance Mechanism	A formal process for stakeholders to submit, track, and resolve complaints related to non-compliance.