

# EU CODE OF CONDUCT ON RESPONSIBLE FOOD BUSINESS AND MARKETING PRACTICES

KELLANOVA<sup>1</sup>

REPORT SUBMITTED ON 5 JULY 2024

Type of business/ sector  <i>(E.g. retail, dairy)</i>	Sustainability dimension  <i>(E.g. environmental, social)</i>	Code aspirational objective  <i>(1-7)</i>	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information (optional)  <i>(E.g. partnerships, geographical coverage, sharing best practices, links with other COM initiatives, with other reporting initiatives)</i>	Comments (optional)  <i>(E.g. enablers, ideas on how to improve)</i>
Food Manufacturing	Environmental	3	45% absolute reduction in Scope 1&2 GHG emissions globally by the end of 2030 compared to a 2015 baseline	33% absolute reduction of Scope 1 and 2 emissions in 2022 compared to a 2015 baseline	In 2015, Kellanova committed to Science-Based Targets to deliver a Scope 1 and 2 target of 65% reduction in GHG emissions by the end of 2050.  For further details see: Kellanova Better Days Promise <a href="#">Climate Action</a>	National governments and competent authorities can provide support for decarbonization efforts for the whole food manufacturing sector by assigning budgets for funds and/or investment in infrastructure for hydrogen networks and in development of hydrogen and low-zero carbon fuel technologies to divert from current dependency on fossil fuels.

<sup>1</sup> Previously Kellogg Company, commitments made as Kellogg are now attributed to Kellanova throughout the report.

Food Manufacturing	Social	1	100% of our children's cereals will be Nutri-Score A or B by the end of 2022 for our EU portfolio	100% of our children's cereals were Nutri-Score A or B <sup>2</sup> at the end of 2023 for our EU portfolio.	<p>The commitment is part of Kellanova Europe's Wellbeing Manifesto for Europe, aiming to further improve our foods so that they are better for people, the community and the planet.</p> <p>Since 2011, we have achieved considerable reductions in sugar (-33%) and salt (-42%), while increasing the amount of fibres (+122%) in our children's cereals for our EU Portfolio.</p>	As a pan-European business, we label our products with multiple languages for sale in a number of European countries, and the proliferation of front-of-pack nutrition labelling schemes at national level presents a challenge for us. A single European front-of-pack nutrition label that is accepted by all EU countries would facilitate reformulation, innovation, and consumer communications.
Food Manufacturing	Social	1	More than 90% of the breakfast cereals in our EU portfolio will be a source of or high in fibre by the end of 2023	91% of the breakfast cereals in our EU portfolio are a source of or high in fibre <sup>3</sup> as of the end of 2023.	To support physical wellbeing, we're crafting foods that include nutrients of need, address hidden hunger or malnutrition, and support a healthy gut microbiome. We know that eating a high-fibre breakfast cereal each day can have a positive impact on the gut microbiome of healthy adults and we are committed to helping consumers increase the fibre in their diets through foods they already eat and enjoy.	EFSA's opinion on the development of front-of-pack nutrition labelling <sup>1</sup> finds that dietary intakes of fibre are below recommended levels in most of the European adult population. Awareness-raising initiatives about fibre, including through claims and front-of-pack nutrition labelling, could help to encourage the consumption of foods that fill this nutritional gap.

<sup>2</sup> As per the Nutri-Score algorithm that was in effect when Kellanova's 2021 Wellbeing Manifesto commitment was made.

<sup>3</sup> 'Source of' and 'high in' fibre are defined by the EU Regulation on Nutrition and Health Claims as >3g/100g and >6g/100g respectively.

**THE FOLLOWING IS EXTRACTED FROM KELLANOVA'S 2022 GLOBAL ESG REPORT AND 2023 EU PLEDGE MONITORING REPORT TO SHOW  
WHERE WE ARE ALSO MAKING PROGRESS BEYOND OUR EU CODE OF CONDUCT COMMITMENTS**

Type of business/ sector  (E.g. retail, dairy)	Sustainability dimension  (E.g. environmental, social)	Code aspirational objective  (1-7)	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information (optional)  (E.g. partnerships, geographical coverage, sharing best practices, links with other COM initiatives, with other reporting initiatives)	Comments (optional)  (E.g. enablers, ideas on how to improve)
Food Manufacturing	Environmental	2	Reduce food waste across our global Kellanova manufacturing facilities by 50% by the end of 2030. (normalised, from a 2016 baseline)	As of year-end 2022, we achieved a 42% normalised reduction in food waste globally from a 2016 baseline.	<p>Kellanova was one of the first companies to join Champions 12.3, a group of global leaders from government, business, research and farming communities committed to working together to meaningfully reduce food loss and waste by the end of 2030.</p> <p>We measure and report our food waste in conformance with the <a href="#">World Resources Institute Food Loss and Waste (FLW) Protocol</a>.</p> <p>For further details see: Kellanova Better Days Promise <a href="#">Food Waste Reduction</a></p>	

Food Manufacturing	Social	1	<p>Kellanova is signatory of the EU Pledge Commitment for responsible marketing to children.</p> <p>EU Pledge membership requires companies:</p> <ul style="list-style-type: none"> <li>• Not to advertise food and beverages to children under 13 years, except for products which fulfil the EU Pledge common nutrition criteria.</li> <li>• No marketing or advertising in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.</li> <li>• To abide by the International Chamber of Commerce (ICC) <a href="#">Code of Advertising and Marketing Communication Practice</a>; and the ICC <a href="#">Framework for Responsible Food and Beverage Marketing Communications</a> in all marketing communications.</li> </ul> <p>EU Pledge member companies have committed to carry out independent, third-party compliance monitoring of the two central EU Pledge commitments</p>	<p>Results of the 2023 EU Pledge Compliance monitoring for Kellanova Europe:</p> <ul style="list-style-type: none"> <li>• TV: The overall compliance rate is 98.15%; the compliance rate for daytime spots with at least 1 GRP it is 100%.</li> <li>• Digital: 9 of 9 influencer posts reviewed were deemed compliant with the EU Pledge (100%).</li> <li>• Digital: 1 of 1 company-owned website reviewed was deemed compliant with the EU Pledge (100%).</li> <li>• Digital: 8 of 10 social media pages reviewed were deemed compliant with the EU Pledge. <ul style="list-style-type: none"> <li>• No social media pages were found to be primarily appealing to children under 13 (100% compliance).</li> <li>• 2 social media pages were in potential breach of the ICC Code and/or</li> </ul> </li> </ul>	<p>The EU Pledge commissioned the following third-party organisations to carry out the independent monitoring:</p> <ul style="list-style-type: none"> <li>• <a href="#">Ebiquity</a> to review EU Pledge member companies' compliance with the commitment relating to TV advertising;</li> <li>• <a href="#">EASA</a> to review EU Pledge companies' branded websites, social media pages and influencer profiles, for compliance with the EU Pledge commitment.</li> </ul> <p>The methodology and process of the monitoring of company-owned websites and social media profiles were reviewed by Professor Liselot Hudders, assistant professor at the Department of Communication Sciences at Ghent University and a postdoctoral fellow of the FWO at the Marketing Department and Dr Dieneke Van de Sompel, visiting Professor at the Department of Communication Sciences at Ghent University.</p> <p>For further details see: Kellanova Better Days Promise <a href="#">Responsible Marketing</a></p>	
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			every year in a representative sample of EU Member States.	ICC Framework (80% compliance).		
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<sup>i</sup> EFSA NDA Panel (EFSA Panel on Nutrition, Novel Foods and Food Allergens), Turck D, Bohn T, Castenmiller J, de Henauw S, Hirsch-Ernst KI, Knutsen HK, Maciuk A, Mangelsdorf I, McArdle HJ, Naska A, Pelaez C, Pentieva K, Thies F, Tsabouri S, Vinceti M, Bresson J-L and Siani A, 2022. Scientific Opinion on the scientific advice related to nutrient profiling for the development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods. *EFSA Journal* 2022;20(4):7259, 48 pp. <https://doi.org/10.2903/j.efsa.2022.7259> ISSN:1831-4732 ©2022 Wiley-VCH Verlag GmbH & Co. KGaA on behalf of the European Food Safety Authority. This is an open access article under the terms of the Creative Commons Attribution-NoDerivs License, which permits use and distribution in any medium, provided the original work is properly cited and no modifications or adaptations are made. The EFSA Journal is a publication of the European Food Safety Authority, a European agency funded by the European Union. Scientific advice related to nutrient profiling [www.efsa.europa.eu/efsajournal](http://www.efsa.europa.eu/efsajournal) 2022;20(4):7259