SUPPLIER CODE OF CONDUCT

General Mills is strongly committed to conducting its business in a lawful and ethical manner, engaging only with suppliers that are committed to the same principles, to ensure a long-term, sustainable, and successful relationship for all parties.

This Supplier Code of Conduct (the "Code of Conduct") describes the requirements and ways of working that General Mills applies together with its upstream supply chain third parties, including, but not limited to, direct suppliers, vendors, contractors, consultants, licensing partners, agents and other third-party providers of goods and services who do business with or on behalf of General Mills. In some cases, this Code of Conduct goes beyond compliance with applicable laws and draws upon internationally recognized standards to advance social and environmental responsibility. When differences arise between the standards set forth in this Code of Conduct and legal requirements, the stricter standard shall apply, in compliance with applicable law.

General Mills will assess its suppliers' compliance with this Code of Conduct and demonstrate that it is working with its suppliers to continuously improve their performance. Violations of this Code of Conduct may jeopardize the supplier's business relationship with General Mills, up to, and including termination. This Code of Conduct applies to General Mills' suppliers and shall be cascaded throughout their supply chains, including to subsidiaries, affiliates, and subcontractors (each a "supplier") providing goods or services to General Mills, or for use in or with General Mills products.

Suppliers shall continuously exercise due diligence to reasonably verify conformance with this Code of Conduct and applicable standards and regulations within their entire supply chain. Suppliers shall develop policies and management systems to identify risks and mitigation measures to correct deviations from this Code of Conduct among their own suppliers.

Suppliers must comply with our Code of Conduct and the Four Pillars of Responsible Sourcing:

- Human Rights
- Health and Safety
- Environment
- Business Integrity

HUMAN RIGHTS

General Mills believes the protection of human rights throughout our supply chain is a critical part of our values and is committed to respecting all human rights across our full value chain. This protection applies to all individuals equally, inclusive of migrant workers, women, and children. General Mills endorses the principles

enshrined in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. Additional detail can be found in our Human Rights Policy.

At a minimum, our suppliers shall uphold these human rights standards:

Forced Labor: Suppliers shall not use involuntary, enslaved, compulsory, coerced, forced, prison, or debt bondage labor of any kind. Suppliers shall not tolerate any form of human trafficking activity and shall not use any corporal punishment, physical or psychological abuse, threats of violence, or coercion to secure or retain their workers. Employment decisions must be based on free choice. Suppliers shall not engage in contract substitution; withhold wages, benefits, personal property, or identification documents; or restrict access to personal financial accounts.

Suppliers shall not require the surrendering of identification as a condition of employment. All workers shall be provided with documentation that clearly states the terms of their employment in a language they understand with a verbal explanation when necessary.

Workers shall not be required to pay recruitment fees or hiring-related fees to employers, agents, or labor brokers even where allowed by local law. In line with the Employer Pays Principle, workers shall not be required to pay recruitment or other employment or hiring-related fees to obtain or retain their employment, directly or indirectly. The cost of recruitment shall be borne by the employer. Suppliers, their agents, and any third-party recruitment agencies or labor brokers shall comply with these principles and are expected to establish a reasonable remediation plan to reimburse fees when identified.

Unless prohibited by local law, suppliers located in the United States shall use the United States Department of Homeland Security's E-Verify program to verify employment eligibility and mandate the use of E-Verify by all their labor agencies, subcontractors, and suppliers located in the United States

Child Labor: Suppliers shall not employ individuals under 15 years of age, or 14 years of age where local law allows, or under the legal minimum age for employment in the country, whichever is greatest. Suppliers shall verify the age and employment eligibility of all workers at the time of hiring and establish appropriate systems to responsibly remediate any potential policy violations.

Any employment of workers under the age of 18 shall not interfere with schooling or vocational education and shall not expose children to risks that could cause health, safety, or moral harm, as specified in the ILO Worst Forms of Child Labour Convention (No. 182). Suppliers shall take all appropriate measures to prioritize a child's well-being in cases of non-compliances.

Freedom of Association and Collective Bargaining: Suppliers shall recognize and respect the rights of employees to freedom of association and collective bargaining. Suppliers shall ensure that representatives of trade unions are not subject to discrimination or harassment.

Anti-Discrimination and Fair Treatment: Suppliers shall treat all workers with respect. There will be no unlawful discrimination, harassment or abuse of any kind, including physical abuse, verbal abuse, mental coercion, or threats, based on race, caste, national origin, religious affiliation, age, disability, gender, physical appearance, marital status, sexual orientation, union membership, veteran status, political opinion, or HIV/AIDS status in relation to employment practices such as hiring, promotion, compensation, termination, retirement, or any other aspect of their employment.

Wages and Benefits: Suppliers shall provide compensation directly to employees which includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards. Where there is no legislated minimum wage, suppliers shall provide wages that are comparable to relevant standard industry wages. Wages shall be paid promptly and in full. Wages shall not be subject to deductions as a disciplinary measure. Wage deductions shall not be used to keep workers tied to the employer or to their employment.

Work Hours and Overtime: Suppliers shall ensure that work schedules and overtime are consistent with all applicable laws and collective bargaining agreements, whichever affords the greater level of protection, including maximum hour and rest period laws. Workers shall receive annual leave and public holidays in accordance with local law.

Freedom of Movement: Workers shall have unrestricted access to necessities such as clean drinking water and toilets during both work and non-work hours at the work site or in employer-provided or arranged housing.

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or in premises such as, but not limited to, employer or recruiter operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom.

Land Rights: Suppliers must respect the land rights of indigenous peoples and local communities impacted by their operations and sourcing practices. All negotiations regarding the property or land of indigenous peoples, including the use of and transfers of it, must adhere to the principles of free, prior, and informed consent, contract transparency and disclosure. Suppliers must refrain from cooperating with any host government's illegitimate use of eminent domain to acquire land that will be used to provide products or services to General Mills.

HEALTH AND SAFETY

Ensuring health and safety is of utmost importance to General Mills. Suppliers shall meet or exceed all applicable health and safety laws, regulations, and industry standards in this area. Suppliers shall provide workers with a safe, clean, and healthy work environment.

At a minimum, our suppliers shall uphold these health and safety standards:

Product Safety and Quality: Consumers trust General Mills to provide them with safe, high-quality food products and we expect the same from our suppliers. Suppliers shall supply only products or services that meet or exceed food safety and quality standards required by applicable law and General Mills Food Safety and Quality Policies. When differences arise between General Mills policy and legal requirements, the stricter shall apply. Suppliers must report any concerns about product safety or quality issues to General Mills Food Safety and Quality.

Safe Working Environment: Suppliers shall routinely assess work environments for health and safety hazards and eliminate, control, or mitigate these identified risks. Suppliers shall provide employees with appropriate workplace health and safety training in their primary language. Suppliers shall ensure that health and safety-related information is accessible at the point of work. Suppliers shall issue employees with the necessary personal protective equipment, at no cost, to protect their health, safety, and welfare. Suppliers shall have in place proper measures to adequately protect workers from occupational heat stress in agricultural and/or manufacturing settings.

If applicable, dormitories must be clean and well-maintained, and must have safe exit routes, adequate fire detection and suppression systems, lighting, and sanitation.

Suppliers shall monitor working environments to assess the exposure of workers and visitors to occupational health hazards, including, but not limited to, chemical exposure, dust, noise, and fumes.

Investigation: Suppliers shall put in place processes to record and investigate accidents and first-aid events. Suppliers shall not take retaliatory measures against their workers for having or reporting bona fide accidents or first-aid events. Suppliers must ensure all workers have the right to refuse and report unsafe or unhealthy working conditions.

Emergency Response: Suppliers must identify and plan for emergency situations. Suppliers must implement and train their employees on response systems, including emergency reporting, alarm systems, worker notification and evacuation procedures, worker training and drills, use of first-aid supplies, use of fire detection and suppression equipment, and location of accessible exit facilities. Suppliers must ensure all workers at their sites are provided such training.

ENVIRONMENT

At General Mills, our goal is to continually reduce our environmental footprint, as we explain in more detail in our Climate Policy. In addition to complying with all applicable environmental laws, we expect suppliers to continually improve their own environmental performance, including, but not limited to, reducing greenhouse gas emissions, reducing, or optimizing the use of water, energy, and agriculture inputs, and minimizing water pollution and waste. General Mills expects its suppliers to implement and conduct ongoing environmental due diligence and may require suppliers to provide information regarding environmental standards and environmental metrics and measures, such as Scopes 1-3 greenhouse gas emissions and renewable energy usage.

Commodity Specific Policies: General Mills has specific expectations for Palm Oil, Cocoa/Chocolate, and Fiber Packaging (carton and corrugated only) suppliers. Suppliers who directly supply General Mills shall refer to our No Deforestation Statement and Palm Oil Policy for guidance on our standards and expectations for compliance with the company's commitment to No Deforestation in our primary deforestation-linked commodities.

Origin Mapping: Suppliers must be capable of disclosing potential sources of primary origin associated with their products or services provided to General Mills. General Mills may ask suppliers for supply chain mapping back to the origin to facilitate assessment of upstream supply chain compliance. If suppliers do not have this capability today, General Mills will require them to share a path towards compliance.

BUSINESS INTEGRITY

Doing the right thing all the time is a core part of General Mills culture. Suppliers must operate with the highest standards for business integrity and comply with all laws and regulations of the countries of their operation. This includes anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act.

At a minimum, our suppliers shall uphold these business integrity standards:

Anti-Corruption: Suppliers cannot offer or accept any bribe, kickback, favor, or use any improper influence when dealing with government officials or in any business arrangements.

Conflicts of Interest: All conflicts of interest between suppliers and General Mills or government officials must be reported to General Mills so that appropriate action can be taken. Conflicts of interest that must be reported include any ownership or interest in the supplier's business by government officials or political parties, or close personal relationships with a General Mills employee. Any conflict of interest must be declared prior to entering the business relationship with General Mills.

Gifts and Hospitality: Gifts and hospitality must be reasonable and entirely for maintaining good business relations and not intended to influence the outcome of decision-making. General Mills prohibits gifts of cash or cash equivalents (such as gift cards, gift vouchers, loans, stock, or stock options). Gifts to General Mills employees may never exceed $100 USD for a single item and the total value of gifts given may never exceed $250 USD total in a calendar year.

Confidential Information and Intellectual Property: General Mills confidential information must be protected and must not be used inappropriately or to support insider trading activity. Suppliers shall respect intellectual property rights and safeguard customer and other protected information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights, protected information, and business operations to protect itself and its customers' business continuity.

Anti-Retaliation: Suppliers shall prohibit unlawful retaliation, including, but not limited to, threats, intimidation, and attacks, against individuals who report a compliance or ethical issue learned during the course of work performed for General Mills, who cooperate in good faith with the investigation of a complaint, or who defend environmental or human rights. Suppliers shall create a mechanism for workers to submit their grievances anonymously and demonstrate that their complaints are reviewed and investigated.

GRIEVANCES AND COMPLIANCE:

Grievances: Suppliers shall provide grievance mechanisms that are transparent, anonymous (where allowed by law), unbiased, responsive, confidential, and communicated to workers across their supply chain in a language they understand.

To report a concern related to General Mills business, suppliers or their workers shall contact their General Mills representative or the General Mills Ethics Line at generalmillsethics.ethicspoint.com or call toll-free 1-800-210-2878. Dialing instructions for locations outside the U.S. are available at the generalmillsethics.ethicspoint.com site. The Ethics Line allows you to remain anonymous (where allowed by law).

Audits, Assessments, and Compliance: General Mills may audit compliance with this Code of Conduct. Suppliers must respond within the allotted time to all audits, assessments, and document requests from General Mills related to the delivery of their products or services. Examples include, but are not limited to, Responsible Sourcing, Cyber Security, Financial Risk, and Anti-Corruption.

Responsible Sourcing audits are facility inspections that include worker interviews and a review of supplier records and business practices. Such audits must be conducted by an Association of Professional Social Compliance Auditors-certified (APSCA) auditor and an approved audit company, paid for by the supplier. If an

audit identifies a violation of this Code of Conduct, the supplier shall act promptly to correct the situation utilizing a Correction Action Plan process.