



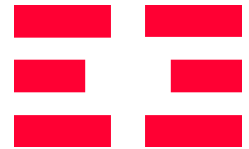
## WK Kellogg Co (Kellogg's)

Subsidiaries: All-Bran, Corn Flakes, Crispix, Froot Loops, Frosted Flakes, Frosted Mini-Wheats, Kashi, Rice Krispies, Special K, Krave, Corn Pops, Raisin Bran, Vector, Apple Jacks

Locations: Michigan (HQ)

Industries: Food Beverage and Tobacco

RISK LEVEL:



High Risk

### DESCRIPTION:

On October 2nd, 2023, Kellogg's split into two companies, WK Kellogg Co, which owns the North American cereal division, and Kellanova, which owns the rest of Kellogg's brands. Actions taken as Kellogg's are kept as Kellogg's while actions taken since the split by WK Kellogg Co are marked as WK Kellogg Co. Kellogg's scored a 100 on the 2023 Corporate Equality Index (CEI) from the Human Rights Campaign (HRC), a political stakeholder group. By complying with the HRC's controversial demands, the company increases the risk of dividing employees, alienating customers and harming shareholders. It also uses sex and gender ideology criteria in employee recruitment, vendor selection, marketing, and philanthropic support. Kellogg's forces employees to undergo multiple ideological trainings and uses its reputation, corporate funds, and political influence to support controversial sex and gender ideologies, organizations, and legislation. The company provides a benefits package for employees which covers travel/lodging costs for an abortion and transgender medical procedures for covered employees and dependents, including children. Kellogg's does not provide viewpoint protections for its employees. The company pulled its ads from a conservative news network in 2016. America First Legal filed a letter with the EEOC requesting a civil rights investigation into Kellogg's over discriminatory practices in hiring. The company provides a benefits package for employees which covers travel/lodging costs for an abortion. Kellogg's pledged \$90 million to BLM and related causes such as the Tides Foundation. Kellogg's signed an open letter in support of the Equality Act. The company embraces Critical Race Theory and is a corporate partner of the National LGBT Chamber of Commerce (NGLCC). Kellogg's opposed various state and local legislation intended to protect parental rights, girls' sports, bathroom facilities, and gendered spaces. The company is a silver partner of PFLAG. The company is a signatory of the Institutional Limited Partners Association's Diversity in Action Initiative, committing itself to specific actions that advance DEI within the governance and policies of the organization and the private equity industry more broadly. For these reasons, WK Kellogg Co receives a High Risk rating.

### Corporate Weaponization

**Has denied service to customers, suppliers, or vendors due to their political views or religious beliefs OR corporately boycotts, divests, or sanctions regions, people groups, or industries. High Risk**

*Kellogg's received a score of 100 on the 2023 Corporate Equality Index (CEI) from the Human Rights Campaign (HRC), a political stakeholder group. The company recruits employees based on sexual identity issues. The company discriminates against vendors that do not promote divisive sex and gender policies, indicating it prioritizes sexual issues over merit(1)(2). WK Kellogg Co has a written policy pledging to vet vendors for LGBTQ policies. Its Code of Ethics requires vendors to include sexual orientation and gender identity in their nondiscrimination policy (3). In 2016, Kellogg's pulled all of its ads from Breitbart News, a conservative news network, along with a number of other companies (4)(5).*

**Charitable giving (including employee matching programs) policies or practices discriminate against charitable organizations based on views or religious beliefs. High Risk**

*Kellogg's HRC CEI rating indicates the company will not donate to non-religious charities unless they embrace controversial sexual identity policies (1)(2). WK Kellogg Co does not appear to discriminate against charitable organizations based on views or beliefs. (3).*

**Employment policies fail to protect against discrimination based on political affiliation/views and/or religion. High Risk**

*WK Kellogg Co does not provide viewpoint protections for its employees (1). Kellogg's HRC 2023 CEI rating indicates the company forces employees to attend multiple, controversial trainings on gender identity, sexual orientation, transgender issues, and divisive racial ideology. The company provides a specific benefits guide with a comprehensive explanation of transgender services funded by the company (2)(3). America First Legal filed a letter with the EEOC requesting a civil rights investigation into Kellogg's over discriminatory practices in hiring (4)(5).*

## Corporate Governance and Public Policy

**Uses corporate reputation to support ideological causes and/or organizations hostile to freedom of expression. High Risk**

*In 2021, Kellogg's ran a partnership with GLAAD featuring "pride" cereal and Froot Loops offers access to an online DEI educational library with the purchase of a cereal box (1)(2)(3)(4). The company has corporately embraced critical race theory and similar ideologies and opposed North Carolina's 2016 bathroom bill (5)(6). Kellogg's signed an open letter in support of the Equality Act (7). The company opposed the Florida Parental Rights in Education Act, which would prohibit teaching gender identity and sexual orientation to kids in K-3rd grade (89). The company's HRC 2023 CEI rating indicates the company agrees to allow a controversial stakeholder group focused on sexual identity issues to dictate marketing or advertising strategy (10)(111213)(14)(15).*

**Uses corporate funds to advance ideological causes, organizations, or policies hostile to freedom of expression. High Risk**

*Kellogg provides a benefits package for employees which covers travel/lodging costs for an abortion and transgender medical procedures for covered employees and dependents, including children (1)(2)(3). Kellogg's HRC 2023 CEI rating indicates the company covers transgender related costs for its employees and their children, including paid short-term leave, puberty blockers, cross-sex hormones, chest surgeries, genital surgeries, medical visits and lab monitoring, travel and lodging. Additionally, the company has pledged philanthropic support of at least one organization or event that promotes sex and gender ideology (4)(5). By allowing a political stakeholder group to dictate operations, the company increases health care costs and risks dividing employees, alienating customers and harming shareholders. The company also pledged \$90 million to the Black Lives Matter movement and related causes (6)(7)(8). In 2021, Kellogg's ran a partnership with GLAAD featuring "pride" cereal and boxes where customers could fill in their own pronouns; this partnership raised funds for GLAAD (9). The company is a corporate partner of the National LGBT Chamber of Commerce (NGLCC) (1011)(12)(13).*

**Uses corporate political contributions for ideological, non-business purposes. High Risk**

*Kellogg's HRC 2023 CEI rating indicates the company publicly advocated for controversial sex and gender ideology through local, state or federal legislation or initiatives (1)(2). By allowing a political stakeholder group to dictate operations, the company risks*

dividing employees, alienating customers and harming shareholders. WK Kellogg Co does not operate a PAC or engage in lobbying at this time (3)(4)(5).

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