

CONAGRA BRANDS, INC.

CODE OF CONDUCT FOR SUPPLIERS

Last Updated: October 19, 2021

Conagra Brands makes everyday food in extraordinary ways and with unwavering attention to our citizenship ambitions. This means making food that's delicious, safe, nutritious and convenient, while addressing the key economic, environmental and social impacts directly linked to our activities and products, such as through business relationships with farmers, suppliers, customers and others. Our citizenship strategy includes four focus areas: Good Food, Responsible Sourcing, Better Planet and Stronger Communities. Together, these strategic pillars articulate our values and ambitions as a responsible corporate citizen. We look forward to making good food for generations to come and doing so in a way that supports responsible sourcing, stronger communities and a better planet.

At Conagra Brands, we believe that adhering to the highest possible standards of integrity and ethical behavior is the only way to succeed, and so we have set the highest standards for the way we conduct business, in areas from corporate and social responsibility to sound business ethics. As such, because the conduct of Conagra Brands suppliers can be attributed to Conagra Brands and its reputation, our expectation is that our suppliers will lawfully conduct their business with the same standards of integrity and ethical behavior. This Code of Conduct for suppliers, while not exhaustive, is established to provide a guideline of expectations, highlighting some key laws and regulations, as well as outlining additional requirements that Conagra Brands expects its suppliers to meet. Suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.

Compliance with Applicable Laws, Regulations and Practices

Suppliers are required to act in accordance with all applicable federal, state and local laws and regulations. Where applicable, suppliers must comply with relevant international laws such as those related to international trade (including export controls, sanctions, and reporting obligations) data protection and data transfer rules, and anti-trust competition laws.

Anti-Bribery and Corruption

Suppliers must not, directly or through others, offer, give or accept any form of payment or incentive to gain an improper business advantage. Suppliers must not engage in bribery (including facilitations payments), kickbacks, money laundering, or any other form of corruption. Suppliers must, as applicable, comply with the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act and shall not take any actions to violate, or cause business partners to violate, any applicable anti-bribery and corruption laws.

Human Rights

Conagra Brands supports corporate responsibility to respect human rights in accordance with the [UN Guiding Principles on Business and Human Rights](#), which states that business enterprises should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved. The responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#). Suppliers must avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur and seek to prevent or mitigate adverse human

rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. Conagra Brands require compliance with relevant human rights policies throughout our supply chain, including:

Respect and Dignity

Proper measures must be taken to promote a workplace free of harassment, harsh treatment, threats of violence, corporal punishment, or other forms of physical coercion.

No Forced or Compulsory Labor

Conagra Brands subscribes to the International Labour Organization definition of “forced or compulsory labor” as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (ILO Convention No. 29, Article 2, para. 2). Suppliers must insure that no forced labor, including bonded, indentured and involuntary prison labor, is used. We prohibit assessment of recruitment or other fees by Conagra Brands suppliers, and surrendering of identification, as a condition of employment. Any fees incurred by Conagra Brands suppliers when using employment agencies in the hiring or recruiting of workers must be paid by Conagra Brands suppliers and such fees cannot later be assessed against workers. Only voluntary employment may be utilized, and workers must be allowed to terminate employment at any time upon reasonable notice.

No Child Labor

Conagra Brands suppliers and their subcontractors are forbidden from using child labor in any circumstance. The term “child” refers to any person employed under the age of 15 (or 14 where the applicable laws permit). Conagra Brands suppliers must insure proper employment of minors at all stage of farming, manufacturing, delivering and processing the finished goods.

Conagra Brands does support the use of legitimate workplace apprenticeship programs, but only if they comply with all applicable laws and regulations.

Working Hours

Conagra Brands suppliers must comply with all applicable laws governing the number of maximum work hours, vacation time, leave periods, and holidays. Suppliers’ employees shall not work beyond the maximum working hours permitted by applicable law. Suppliers will compensate for overtime hours in accordance with applicable laws.

Wages and Benefits

Suppliers must provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards.

Freedom of Association

Conagra Brands requires that its suppliers recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with the all applicable laws. Additionally, Conagra encourages its suppliers to establish open communication and direct engagement between employees and management as a means by which to support positive employee relations.

Non-Discrimination

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics or beliefs. Conagra Brands suppliers must not discriminate in hiring and employment practices based on race, color, gender, gender identity or expression, religion, age, nationality, sexual orientation, social or ethnic origin, disability, pregnancy, political affiliation, veteran status, union membership or marital status.

Immigration Laws Compliance

Suppliers shall only employ workers with a legal right to work, which must be validated by suppliers before the employment by reviewing the relevant documents. Procedures which demonstrate compliance with these validations must be implemented. Conagra Brands suppliers must regularly audit employment agencies from whom they obtain workers to monitor compliance with this requirement.

Health and Safety at Workplace

Suppliers must insure that they have a safe and healthy working environment to include appropriate controls, safe procedures, preventative maintenance and appropriate protective equipment in compliance with all applicable laws and regulations. This is especially important when dealing with hazardous materials.

Environmental & Social Impact

Conagra Brands expects that its suppliers will act in an environmentally and socially responsible manner. At a minimum, this means suppliers who are in compliance with applicable laws and regulations, and who have the commitment as well as the ability to remediate any problems they may cause.

Conagra Brands is committed to the following and requires the same of its suppliers: reducing environmental impacts such as deforestation, greenhouse gas emissions, and waste generation; protecting water resources through restorative or conservation efforts; supporting social needs in the communities in which it operates through philanthropic investment, diversity and inclusion, human rights practices; and supporting sustainability and traceability efforts of goods and services throughout the supply chain, including agriculture.

Deforestation

- Fiber-based Packaging

Conagra Brands does not procure paper fiber directly sourced from areas at high risk for deforestation, specifically natural forests in Sumatra, Borneo, New Guinea, and the Russian Far East. Our procurement policy also requires that paper fiber directly sourced from Indonesia, Malaysia, China, Thailand, or Colombia have third-party sustainable forestry certification (e.g., SFI, FSC, PERC, Rainforest Alliance).

- Soy

Conagra Brands does not procure soy directly sourced from areas at high risk for deforestation, specifically the Amazon, the Cerrado and the Gran Chaco in Latin America.

- Beef

Conagra Brands does not procure beef directly sourced from areas at high risk for deforestation, specifically the Amazon, the Cerrado and the Gran Chaco in Latin America.

- Palm Oil

Conagra Brands sources certified sustainable palm oil from suppliers whose landholdings and operations meet the environmental and social responsibilities of the Roundtable on Sustainable Palm Oil (RSPO).

Animal Welfare

Conagra Brands is committed to the humane treatment of animals in accordance with the five freedoms of animal welfare:

- Freedom from hunger and thirst, by ready access to water and a diet to maintain health and vigor.
- Freedom from discomfort, by providing an appropriate environment.
- Freedom from pain, injury and disease, by prevention or rapid diagnosis and treatment.
- Freedom to express normal behavior, by providing sufficient space, proper facilities and appropriate company of the animal's own kind.
- Freedom from fear and distress, by ensuring conditions and treatment that avoid mental suffering.

Conagra Brands requires its suppliers to implement humane procedures in support of the five freedoms of animal welfare at all times, including when animals are raised, cared for, transported, and processed. Conagra Brands requires that suppliers provide an environment that is free from stress, cruelty, abuse, and neglect throughout the life of the animal. For some animal products, Conagra Brands' animal welfare policy includes compliance with commodity-specific policies, goals and standards for responsible animal housing and care beyond regulations.

- Broiler Chickens

Conagra Brands will work with its suppliers, peers and other external stakeholders in an effort to help achieve the following improvements in the treatment of broiler chickens by 2024:

- Source 100% of chicken used in products from either Royal Society for the Prevention of Cruelty to Animals (RSPCA) or Global Animal Partnership (GAP)-approved breeds or strains.
- Offer improved environments that meet GAP standards for better lighting, litter quality and other enrichments.
- Provide birds with more space to perform natural behaviors, including a stocking density of no greater than six pounds per square foot and no use of broiler cages.
- Employ a multi-step controlled atmosphere processing system and avoid live-shackling or live-dumping.
- Track supplier compliance via third-party auditing.

We recognize that our 2024 goals require industry-wide partnership to succeed and we will collaborate across our value chain to further animal welfare while preserving consumer access to quality, affordable food.

Ethical Dealings

Conagra Brands suppliers may not participate in or permit any forms of corruption, bribery, extortion, or embezzlement.

Compliance Monitoring and Documentation

Suppliers must maintain necessary documentations to demonstrate their compliance with this Code of Conduct for Suppliers. Conagra Brands and/or its designated agents maintain the right to take certain actions, such as inspection of production facilities or review of the applicable documentation, to ensure compliance with this Supplier Code of Conduct.

Suppliers concerned about potential violations of this Code of Conduct for Suppliers should call 866.567.CODE (2633) or log on to www.ethicspoint.com.