

# Conagra Brands Inc.

**TICKER**  
 NYS:CAG

**MARKET CAPITALIZATION**  
 US\$11 billion

**HEADQUARTERS**  
 United States

**DISCLOSURES**
UK Modern Slavery Act: Not applicable

California Transparency in Supply Chains Act: Yes

**TARGETS**

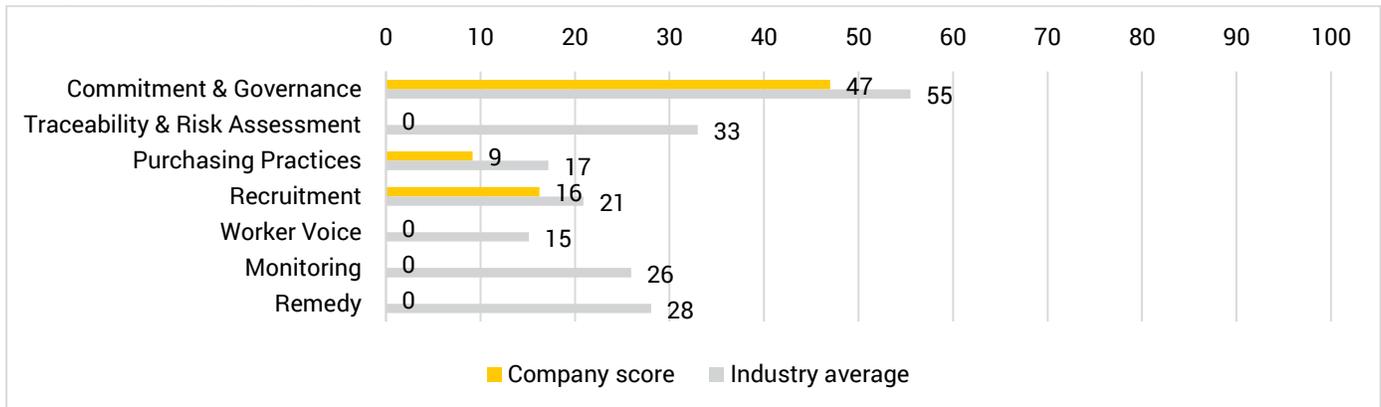
None

**OVERALL RANKING**
**35 out of 43**

(2018 Rank: 26 out of 38)

**OVERALL SCORE**
**10 out of 100**
**SUMMARY**

Conagra Brands Inc. (Conagra), an American packaged foods company, ranks 35<sup>th</sup> out of 43 companies and discloses less information on its forced labor policies and practices than its peers. Since 2018, the company has taken only limited steps to improve (namely updating its supplier code to prohibit passport retention). As the benchmark methodology requires companies to keep up with evolving stakeholder expectations and emerging good practices, the company's score has decreased by eight points. The company's score is based on its disclosure of a supplier code of conduct prohibiting forced labor, internal responsibility for the code, staff training, integration of the code into purchase orders with suppliers, and a no-fee policy. The company is encouraged to improve on the themes of Traceability & Risk Assessment, Worker Voice, and Remedy.

**THEME-LEVEL SCORES**


Research conducted through February 2020 or through May 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

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**KEY DATA POINTS****SUPPLIER LIST**

No

**NO-FEE POLICY**Yes ([Employer Pays Principle](#))**SUPPORTS FREEDOM OF ASSOCIATION**

No

**REMEDY FOR SUPPLY CHAIN WORKERS**

No

**HIGH-RISK COMMODITIES**Palm oil, peanuts, tomatoes, and others<sup>1</sup>

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**LEADING PRACTICES**

None.

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**NOTABLE FINDINGS**

**Commitment & Governance:** The company discloses its supplier code of conduct, which prohibits forced labor, and states that it expects suppliers to ensure their suppliers act in accordance with the code. Conagra reports that its CSR steering committee leads its responsible sourcing work and oversees a team of procurement, sustainability, and social responsibility experts, and that the company uses the supplier code to reduce risks in its supply chains. It states that, since 2012, it has provided annual training on forced labor and human trafficking and on risk mitigation within its supply chains to all of its California-based company employees and management who are responsible for supply chain management.

**Recruitment:** The company's supplier code prohibits worker-paid recruitment fees and the retention of workers' passports.

**Purchasing Practices:** Conagra discloses that it purchases palm oil only from RSPO members (RSPO certification covers forced labor). The company incorporates its supplier code, which includes provisions on forced labor, into its "Purchase Order - General Terms and Conditions," and discloses the contract terms.

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**OPPORTUNITIES FOR IMPROVEMENT**

**Traceability & Risk Assessment:** To demonstrate a strong understanding of its supply chains, the company may consider disclosing the names and addresses of its first-tier suppliers, the countries of its below-first-tier suppliers, the sourcing countries of raw materials at high risk of forced labor, and information on its suppliers' workforce. The company is further encouraged to assess forced labor risks across its supply chains and disclose the risks identified.

**Worker Voice:** To prevent and address forced labor and human trafficking risks in its supply chains, the company may consider ensuring that a formal and effective mechanism to report grievances regarding labor conditions is available and communicated to its suppliers' workers and relevant stakeholders such

as worker organizations or labor NGOs. Further, the company is encouraged to take steps to ensure that workers in its supply chains are educated on their rights and are able to exercise their right to freedom of association.

**Remedy:** The company may consider establishing a process for creating corrective action plans with suppliers that are found to violate workers' fundamental rights and freedoms (those articulated in the ILO Declaration on Fundamental Principles and Rights at Work). It may also consider designing a procedure to ensure that remedy is provided to its suppliers' workers in cases of human trafficking and forced labor.

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**ENGAGED WITH KNOWTHECHAIN**

No.

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<sup>1</sup> The US Department of Labor lists these commodities as commodities that may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor.](#)"