

Conagra Brands Inc.

TICKER
NYSE:CAG

MARKET CAPITALIZATION
US\$15 billion

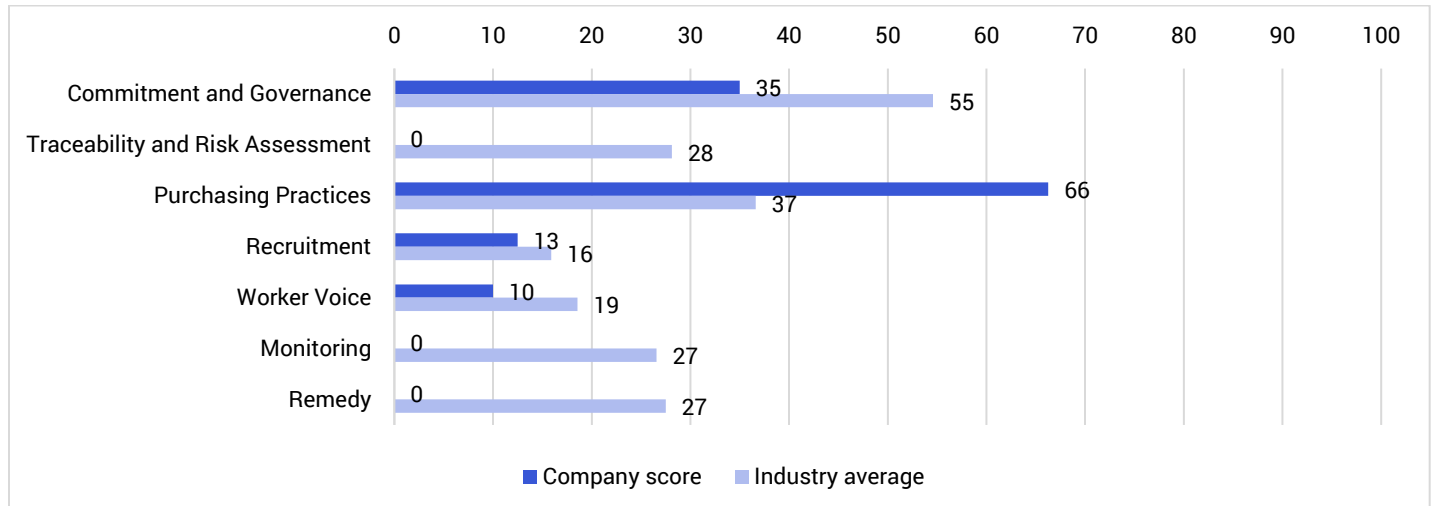
HEADQUARTERS
United States

COMPLIANCE
UK Modern Slavery Act: [Not applicable](#)
California Transparency in Supply Chains Act: [Yes](#)
COMMITMENTS
[None](#)
OVERALL RANKING
26 out of 38

(2016: 14 out of 20)

OVERALL SCORE
18 out of 100
SUMMARY

Conagra Brands Inc. (Conagra), a US-based packaged foods company offering products such as meals, condiments, snacks, and dehydrated vegetables, ranks 26th out of 38 companies, disclosing less information on its forced labor policies and practices than its peers. The company does not seem to have improved its performance and disclosure since 2016, which due to a strengthened methodology means its score decreased. Conagra's score is based on its stronger performance on the theme of purchasing practices. The company is encouraged to improve its performance and disclosure on the themes of traceability and risk assessment, monitoring, and remedy.

THEME LEVEL SCORES

 Research conducted through March 2018, or through June 2018 where companies provided additional disclosure or links. For more information, see the full dataset [here](#).

LEADING PRACTICES

None.

NOTABLE FINDINGS

Supplier Code of Conduct: Conagra publishes a supplier code of conduct that includes the four fundamental freedoms (those articulated in the ILO Declaration on Fundamental Principles and Rights at Work) and that is easily accessible from the company's website.

Purchasing Practices: Conagra states that, to ensure it sources palm oil that meet its sustainability criteria, it uses mass balance RSPO-certified palm oil for approximately 93% of its production (RPSO is an ISEAL full member standard and includes the prohibition of forced labor). Further, the company discloses that it has "integrated social and environmental considerations into the supplier selection process." The company states that all suppliers are contractually required to follow its supplier code of conduct, which includes a clause on the prohibition of forced labor. In addition, Conagra's supplier code includes a requirement for suppliers to ensure that their suppliers and sub-contractors act in accordance with the company's standards.

Recruitment Fees: Conagra's supplier code of conduct specifies that "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."

OPPORTUNITIES FOR IMPROVEMENT

Traceability and Risk Assessment: The company discloses some steps to trace its palm oil supply chains. To better demonstrate a strong understanding of its supply chains across commodities, the company may consider disclosing the names and addresses of first-tier suppliers, the countries of 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.

Monitoring: While the company states that it reserves the right to audit supplier compliance against its standards, it does not currently perform such audits on a regular basis. The company may, therefore, consider adopting and disclosing a supplier monitoring process to verify that its suppliers are compliant with its supply chain standards. Implementing specific practices, such as interviewing workers and conducting unannounced audits of suppliers, may help the company detect forced labor risks in its supply chains. Disclosing information on the results of its supplier audits, such as the percentage of suppliers audited annually or a summary of findings, assures stakeholders that the company has strong monitoring processes in place.

Remedy: The company may consider establishing a process for creating corrective action plans with suppliers that are found to be in violation of 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 remedy is provided to its suppliers' workers in cases of human trafficking and forced labor.

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[No.](#)