

The J. M. Smucker Company

TICKER
NYSE:SJM

MARKET CAPITALIZATION
US\$14 billion

HEADQUARTERS
United States

COMPLIANCE

UK Modern Slavery Act: [Not applicable](#)

California Transparency in Supply Chains Act: [Yes](#)

COMMITMENTS

[Yes](#)

OVERALL RANKING

14 out of 38

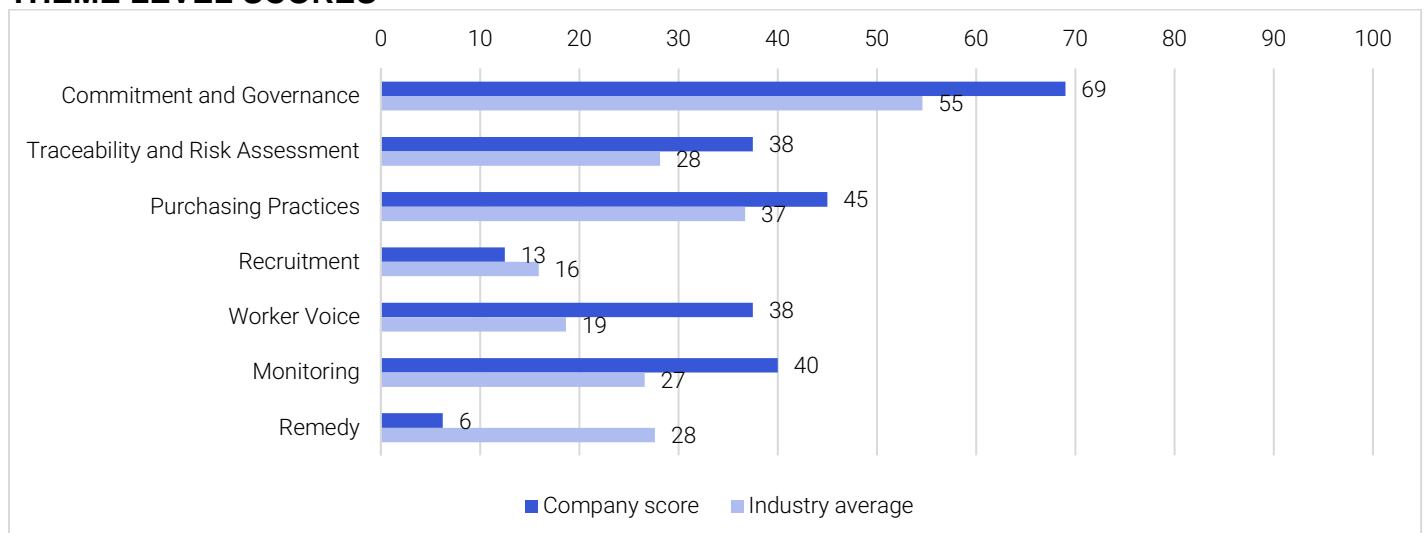
OVERALL SCORE

35 out of 100

SUMMARY

The J.M. Smucker Company (Smucker), a manufacturer of food and beverage products, ranks 14th out of 38 companies, disclosing more information on its forced labor policies and practices than its peers on all themes except recruitment and remedy. The company's score is based on its stronger performance on the themes of commitment and governance and purchasing practices. The company has an opportunity to improve its performance and disclosure on the themes of recruitment, worker voice, and remedy.

THEME LEVEL SCORES



LEADING PRACTICES

Management and Accountability: Smucker discloses that, as part of its commitment to responsible sourcing practices, it has appointed a new Responsible Sourcing Manager who is part of the Ethics and Compliance team. It states that this role has "full-time responsibilities for the implementation of supply chain policies and standards relevant to human trafficking."

Stakeholder Engagement: Smucker reports that it is a member of the Board of the Consumer Goods Forum (CGF) and part of the Social Sustainability Steering Committee. Additionally, it participates in the CGF's working groups implementing the Priority Industry Principles throughout the seafood and palm oil sectors. The company also discloses that it is a member of the Forced Labor Working Group of US Customs and Border Protections (CPB), where it contributes to defining CBP's standards for allegations and appeals.

NOTABLE FINDINGS

Risk Assessment: Smucker discloses that it created a cross-functional task force to carry out a risk assessment on its commodity sourcing. It states that this team assessed forced labor risks across its supply chains to identify high-risk commodities with known human rights issues. It uses this information to determine the use of social compliance audits for suppliers.

Purchasing Practices: Smucker discloses that, as part of its zero-tolerance policy for illegal transshipment practices throughout its seafood supply chains, it requires all suppliers to provide legal documentation to verify that they are not using transshipment practices, which are at high risk of forced labor. The company further provides the contract language of its purchase order terms and conditions, which requires suppliers to comply with Smucker's Global Supplier Code of Conduct. The contracts for both direct and indirect contracts also include an additional clause prohibiting forced labor and human trafficking.

Grievance Mechanism: Smucker discloses a grievance mechanism that is accessible to suppliers' workers and other stakeholders. It states that it requires its suppliers to appoint responsible personnel for communicating the standards of its code to their workers, including the details of the grievance mechanism. It discloses that, during audits, it assesses whether the mechanism has been communicated to workers.

OPPORTUNITIES FOR IMPROVEMENT

Recruitment: The company may consider developing and disclosing a policy that requires direct employment in its supply chains. In addition, the company may consider requiring recruitment agencies—and, where relevant, employment agencies—in its supply chains to uphold workers' fundamental rights and freedoms. The company is further encouraged to disclose information on the recruitment agencies used by its suppliers.

Worker Voice: To prevent forced labor in its supply chains, the company is encouraged to work with relevant stakeholders to engage with and educate workers in its supply chains on their labor rights. To ensure scalability and effectiveness, the company may consider ensuring that there are worker-to-worker education initiatives on labor rights in its supply chains and measuring and disclosing evidence of the positive impact of worker engagement in its supply chains.

Remedy: The company is encouraged to establish a process to ensure that suppliers found to be in violation of applicable regulations and/or the company's standards enact corrective action plans with the goal of improving conditions and achieving compliance. The company may consider establishing corrective action plan processes that include potential actions taken in case of non-compliance, a means to verify remediation and/or implementation of corrective actions, and potential consequences if corrective actions are not taken.

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Yes.](#)