

CongAgra Foods Inc.

TICKER:
NYSE: CAG

MARKET CAPITALIZATION:
US\$ 17 billion

HEADQUARTERS:
United States

14 OUT OF 20

Company’s Overall Ranking

25 OUT OF 100

Company’s Overall Score

ConAgra Foods Inc. (ConAgra) ranks fourteenth on the benchmark, providing below average disclosure on its approach to mitigating the risks of forced labor and human trafficking in its supply chain. The company cascades its forced labor related standards throughout its supply chain and includes them in supplier contracts. The company also demonstrates robust practices with respect to recruitment fees and auditing of recruiters. In order to improve its benchmark performance, ConAgra is encouraged to disclose the details of its audit process and its audit results. The company also has an opportunity to improve in the areas of worker voice and remedy.

THEME LEVEL SCORE

Commitment and Governance	52 out of 100
Traceability and Risk Assessment	38 out of 100
Purchasing Practices	50 out of 100
Recruitment	33 out of 100
Worker Voice	5 out of 100
Monitoring	0 out of 100
Remedy	0 out of 100

LEADING PRACTICES

None.

NOTABLE FINDINGS

Commitment & Governance
ConAgra’s Code of Conduct explicitly prohibits forced labor and all employees are required to complete e-learning Compliance Training Program courses on the behavioral and ethical guidelines outlined in the company’s Code of Conduct. In addition, the company discloses that all its California-based management and employees responsible for supply chain management are trained on human trafficking and slavery. Further, ConAgra’s Code of Conduct for Suppliers addresses all four fundamental human rights, including forced labor.

Purchasing practices
ConAgra discloses in its Purchase Order General Terms and Conditions that all suppliers are contractually required to adhere to the Code of Conduct for Suppliers, which includes the prohibition of human trafficking, slavery, and any other involuntary employment. ConAgra extends its supply



chain standards beyond the first-tier, disclosing that “suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with the Code of Conduct for Suppliers.”

Recruitment

ConAgra states in its Code of Conduct for Suppliers that “any fees incurred by ConAgra Foods’ suppliers when using employment agencies in the hiring or recruiting of workers must be paid by ConAgra Foods’ suppliers.” Further, the company requires its suppliers to audit their recruiters.

OPPORTUNITIES FOR IMPROVEMENT

Worker Voice

ConAgra is encouraged to ensure that its forced labor and human trafficking policies and standards are communicated to workers in its supply chain. The company is also encouraged to ensure suppliers provide workplace environments in which workers are able to pursue alternative forms of organizing where there are regulatory constraints on freedom of association and to engage with workers outside of the farm or factory context on their workplace rights. Within its "Code of Conduct for Suppliers," ConAgra discloses a website and telephone mechanism where suppliers can report grievances. ConAgra may consider improving this mechanism by demonstrating how it proactively communicates the mechanism to suppliers' workers and takes steps to ensure the mechanism is trusted.

Monitoring

Although ConAgra states that it reserves the right to audit suppliers’ operations to ensure compliance, the company may consider disclosing evidence of implementing this audit process. Further, the company is encouraged to strengthen its process by conducting scheduled and non-scheduled audits of its suppliers and interviewing workers. The company is also encouraged to report the results of supplier audits in order to enhance the transparency of its monitoring process.

Remedy

ConAgra is encouraged to implement remedy programs for workers in its supply chain whose rights have been violated and to disclose the outcomes of its remedy programs. Further, the company is encouraged to develop and disclose corrective action plans for suppliers that are non-compliant with its regulations and/or standards.

COMPANY PROVIDED ADDITIONAL DISCLOSURE:

Provided [link](#).

