

CONAGRA FOODS, INC.

CODE OF CONDUCT FOR SUPPLIERS

At ConAgra Foods, 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 Foods suppliers can be attributed to ConAgra Foods 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 Foods 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.

Workplace and Human Rights

- *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.

- *Voluntary Employment*

ConAgra Foods suppliers must insure that no forced labor, including bonded, indentured and involuntary prison labor, **inclusive of human trafficking and slavery**, is used. **Accordingly, any work performed by an employee that is involuntary and/or performed under threat of physical harm or other penalty is prohibited.** Only voluntary employment may be utilized and workers must be allowed to terminate the employment at any time upon reasonable notice.

- *Child Labor Avoidance*

ConAgra Foods 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 Foods suppliers must insure proper employment of minors at all stage of farming, manufacturing, delivering and processing the finished goods.

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

- *Working Hours*

ConAgra Foods 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 Foods 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 Foods 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 Foods suppliers must regularly audit employment agencies from whom they obtain workers to monitor compliance with this requirement.

Animal Welfare

ConAgra Foods is committed to the humane treatment of animals. ConAgra Foods requires its suppliers to implement humane procedures to prevent the mistreatment of animals at all times, including when they are raised, cared for, transported, and processed. ConAgra Foods require that suppliers provide an environment that is free from stress, cruelty, abuse, and neglect throughout the life of the animal.

Health, Safety, and the Environment

- *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.

- *Protection of the Environment*

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

Ethical Dealings

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

Monitoring and Record Keeping

Suppliers must maintain necessary documentations to demonstrate their compliance with this Code of Conduct for Suppliers. ConAgra Foods 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.