

ConAgra Foods Disclosure Information

ConAgra Foods, Inc. (ConAgra Foods) is a retail seller/manufacturer as that term is defined in the California Transparency in Supply Chains Act of 2010 (the “Act”), California Civil Code Section 1714.43(a)(1).

Accordingly, pursuant to the requirements in the Act, ConAgra Foods makes the following disclosures:

1. ConAgra Foods’ Code of Conduct specifically prohibits human trafficking and slavery in its product supply chains. Although ConAgra Foods does not engage in third-party verification to evaluate and address risks, all complaints filed through ConAgra Foods’ Ethics Point system, a third-party complaint management system, are promptly and thoroughly investigated and handled as appropriate.
2. ConAgra Foods requires its suppliers and contract manufacturers to adhere to ConAgra Foods’ standards with respect to all aspects of business dealings. ConAgra Foods’ Code of Conduct for Suppliers, which all suppliers are contractually required to follow, details ConAgra Foods’ expectations with regard to various matters including the prohibition of human trafficking, slavery and any other involuntary employment. ConAgra Foods’ suppliers are obligated to maintain necessary documentation to demonstrate their compliance with the Code of Conduct for Suppliers, and ConAgra Foods reserves the right to audit their operations to ensure compliance. Currently, audits are not regularly performed, nor are they conducted by an independent party.
3. ConAgra Foods’ Code of Conduct for Suppliers requires all direct suppliers that provide materials incorporated into the product to act in accordance with all applicable federal, state, and local laws and regulations, as well as international laws, when applicable.
4. ConAgra Foods maintains internal accountability standards for employees and/or contractors who fail to meet ConAgra Foods’ standards regarding human rights. Specifically, all employees and contractors are expected to follow ConAgra Foods’ Code of Conduct, which sets forth the requirement that specifically prohibits human trafficking and slavery and requires that all employees are treated fairly and in accordance with all federal, state and local laws. All complaints filed through ConAgra Foods’ Ethics Point system, a third-party complaint management system, are promptly and thoroughly investigated and handled as appropriate. Any employees and/or contractors who are found to be in violation of ConAgra Foods’ Code of Conduct are dealt with appropriately.
5. Beginning in 2012, ConAgra Foods provides annual training to all California-based company employees and management who have direct responsibility for supply chain management, regarding human trafficking and slavery and mitigating risks within supply chains.