

Human Rights Policy



- 1. Purpose.** The purpose of the Human Rights Policy (the "Policy") is to ensure the fair treatment of our workforce in all of our operations. Our commitment to respecting human rights is embodied in our **Code of Conduct** and its underlying principles that require compliance with all applicable laws and respect for internationally recognized human rights in the countries where we operate. This Policy outlines the core standards and expectations we have for Conagra employees, candidates for employment, and all other workers over whom we have management control.
- 2. Scope.** This Policy applies to employees of Conagra Brands, Inc. and its subsidiaries ("Conagra") and to all locations and situations where Conagra business is conducted.
- 3. Policy.** Our approach encompasses several human rights issues including forced labor, bonded labor, child labor, human trafficking, and slavery-like practices. We have embodied our commitment to prohibit these practices in our labor, employment, and business conduct policies, systems, and controls, all with the aim of preventing these practices throughout our organization and our supply chains. Our policies and practices are guided by our engagement with key stakeholders and intended to align with federal and state laws of the United States, including the California Transparency in Supply Chains Act, as well as key internationally recognized human rights principles including the United Nations Guiding Principles for Business and Human Rights (UNGP), the United Nations Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, Canada's Bill S-211 Fighting Against Forced Labor and Child Labor in Supply Chains Act, and guidelines for multinational enterprises from the Human Rights Task Team of the Organization for Economic Co-operation and Development.

Child Labor

At Conagra, we comply with all applicable laws pertaining to child labor. We prohibit the use of child labor for hazardous work. We respect compulsory education laws and do not permit younger workers to perform work that may threaten their health and well-being or interfere with their education or vocational training. We require verification of our workers' ages at the time of hiring and we maintain processes to responsibly remediate any potential violations of this Policy.

Forced Labor & Human Trafficking

At Conagra, the employment relationship must be voluntary, and the terms and conditions of employment must comply with applicable laws and regulations. Conagra prohibits all forms of forced labor, indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking. All employment decisions must be based on free choice.

All employees have freedom of movement, and Conagra's conditions of employment do not restrict their movement through the retention of identity papers, holding of deposits, accommodation requirements, or any other action aimed at restricting worker mobility. Furthermore, no worker should be required to pay abusive recruitment or other similar fees to secure or retain their employment. The cost of recruitment should be paid by either Conagra or the workers' employer.

Freedom of Association & Collective Bargaining

Conagra is committed to respecting employees' lawful freedom of association and recognizes all legal rights to organize and collectively bargain through a labor union, or to choose not to join a labor union, without fear of intimidation, harassment, or retaliation.

Working Hours, Wages & Benefits

Conagra complies with all applicable wage, working hours, meal and rest period, and overtime laws. We provide our employees with compensation and benefits that are fair and equitable for the type of work performed and the local labor market where the work is performed. We also comply with the terms of applicable collective bargaining agreements. Our employees receive at least the required minimum wage and are provided benefits and overtime compensation in compliance with applicable laws.

Workplace Health & Safety

At Conagra, we protect the safety, health, and well-being of our employees. We have established policies to drive health and safety throughout our business, which support our vision for achieving an injury-free work environment and creating a culture of positive impact on the health and well-being of our employees and surrounding environment.

Discrimination, Harassment & Equal Opportunity

Conagra is an equal opportunity employer and prohibits unlawful discrimination and harassment against applicants for employment and employees on the basis of race, ethnicity, color, gender, sexual orientation, gender identity or expression, age, religion, national origin, disability, medical condition, marital status or veteran status, and other categories protected by applicable law.

Expectation for our Suppliers & Business Partners

Conagra is committed to high standards of ethical behavior. We expect our employees to hold our suppliers, vendors, contractors, agents, and service providers, including contract manufacturers and joint venture partners, to similar standards by monitoring their compliance with their contractual commitments and our **Supplier Code of Conduct**. When dealing with our business partners, our employees will set the expectation that they will, at all times, conduct their business lawfully and with equivalent standards for integrity and ethical behavior.

Enforcement of the Policy

Conagra believes effective enforcement is essential to the success of this Policy. Employees who believe this Policy has been violated should report the suspected violation to a manager, Human Resources representative, legalethicsandcompliance@conagra.com, the Legal Department, or through Conagra's Ethics & Compliance Hotline. No retaliatory action will be tolerated against anyone who raises concerns in good faith about possible violations of this Policy. Employees who violate this Policy may be subject to disciplinary action, up to and including termination. Conagra investigates reports of actual or suspected violations of company Policy or the law, promptly, fairly, and in accordance with our legal obligations.

4. Questions.

Contact the Legal Department through legalethicsandcompliance@conagra.com.
