



# SUPPLIER CODE OF CONDUCT



Last Updated: January 2026





• **TABLE OF CONTENTS** •

Our Vision, Values, and Mission ..... 2

Expectations for Our Suppliers ..... 2

Conagra's Expectations ..... 3

Speaking Up ..... 3

Conagra's Hotline ..... 4

Conagra's Investigations ..... 4

Complying with Applicable Laws ..... 5

Preventing Bribery and Corruption ..... 5

Avoiding Conflicts of Interest ..... 6

Competing Fairly ..... 6

Respecting Privacy and Confidentiality ..... 7

Safe and High Quality Products ..... 8

Providing Safe Environments for Workers ..... 8

Encouraging Belonging ..... 9

Respecting Human Rights ..... 10

Responsible Sourcing ..... 11

Supplier Engagement ..... 12

Questions ..... 12





## OUR VISION

Conagra has the most energized, highest impact culture in food. Our people persistently challenge and disrupt marketplace/business conventions and we are respected for our great brands, great food, great margins, and consistent results.

## OUR MISSION

Strengthen Conagra’s portfolio, capabilities and culture to accelerate growth, improve margins, generate strong cash flow, and maximize value creation.

## OUR TIMELESS VALUES

### INTEGRITY

Doing the right things and doing things right.

### EXTERNAL FOCUS

Centering on the consumer, customer, competitor, and investor.

### BROAD-MINDEDNESS

Rejecting silos and embracing disciplined curiosity.

### AGILITY

Converting insights into action with the speed of an entrepreneur.

### LEADERSHIP

Simplifying, making decisions, inspiring others, and acting like an owner.

### RESULTS

Leveraging a “refuse-to-lose” obsession with impact and value creation.

## EXPECTATIONS FOR OUR SUPPLIERS

Conagra Brands adheres to high standards of integrity and ethical behavior in order to succeed. We know that the conduct of our suppliers may be associated with Conagra Brands and may impact our reputation. Therefore, Conagra Brands expects our suppliers to adhere to the high standards set in this Supplier Code of Conduct and that our suppliers will at all times conduct their business lawfully and with equivalent standards for integrity and ethical behavior.

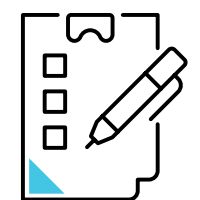
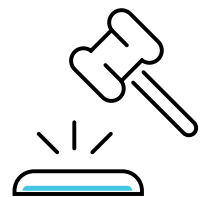
- Conagra's Supplier Code of Conduct applies to suppliers, vendors, contractors, agents, and service providers who provide goods or services to Conagra including co-manufacturers and joint venture partners (“suppliers”). Additionally, we expect our suppliers to take reasonable measures to cause their employees, contractors, and other workers to comply with Conagra’s workplace standards and policies regarding proper use of Conagra’s equipment and property when interacting with our employees, performing on-site services or using our equipment and property.
- Suppliers are also expected to apply standards consistent with this supplier code throughout their own supply chains.
- This Supplier Code of Conduct while not exhaustive, is established to provide a guideline of our expectations, highlighting some key laws and regulations, as well as outlining additional requirements that Conagra Brands expects its suppliers to meet.
- If a supplier agrees to do business with Conagra, then it accepts this Supplier Code of Conduct.



# • CONAGRA'S EXPECTATIONS •

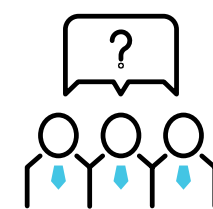
# • SPEAKING UP •

## DOING THE RIGHT THINGS AND DOING THINGS RIGHT

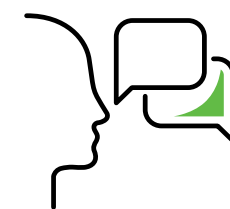


- Act in accordance with all applicable laws; if Conagra's standards require more than the law, comply with Conagra's standards.
- Adhere to this Supplier Code of Conduct and make it accessible to your team members and business partners.
- Communicate promptly any potential issues that may impact Conagra Brands and its business.
- Adopt a Code of Conduct for your employees and a Supplier Code of Conduct for your business partners that sets high standards for ethical business conduct and mandates legal compliance.
- Provide training to your team members on your Code of Conduct and Conagra's expectations under this Supplier Code of Conduct.
- Keep up to date on Conagra's standards and policies beyond this Supplier Code of Conduct.
- Ensure your team is complying with your contractual obligations, Conagra's standards and expectations, including this Supplier Code of Conduct, when acting on behalf of Conagra.
- Foster an environment in which team members feel comfortable asking questions about ethical business conduct and legal compliance.
- Keep and maintain records that demonstrate your compliance with this Supplier Code of Conduct including financial records, production records, and records related to government dealings.
- Make products, records, and facilities available for audits, inspections, and tests.

Doing the right things and doing things right requires that our Suppliers know the legal and ethical responsibilities that apply to activities that may impact Conagra.



If you have questions about how to meet Conagra's expectations, or concerns about potential violations of this Code, your contractual obligations, or the law, you should reach out to the team member who is primarily responsible for your relationship with Conagra or to Conagra's Ethics & Compliance Team through its Hotline.



**You should speak directly and immediately to Conagra's Ethics & Compliance Team with concerns relating to this Supplier Code of Conduct, including, among other things:**

- Bribery or Kickbacks
- Theft of Conagra assets including trade secrets
- Business dealings that violate sanctions laws
- Food safety issues
- Forced labor, illegal underage workers, or other unlawful employment practices
- Worker safety issues
- Government investigations or enforcement actions

## RETALIATION IS STRICTLY PROHIBITED

We support open and honest communication with our suppliers and encourage their team members to report concerns. We do not tolerate retaliation against any individual who, in good faith, seeks advice, raises concerns, or reports misconduct pursuant to the Code.

## • CONAGRA'S HOTLINE •

Concerns may be conveyed through Conagra's Ethics and Compliance Hotline either by phone, online, or email. The phone and online reporting options are managed by an outside third-party company, EthicsPoint. Providing contact information when reporting concerns helps us to follow-up and provide feedback when appropriate. However, you may choose to report anonymously and confidentially.

### CONAGRA'S ETHICS & COMPLIANCE HOTLINE



#### Phone:

United States and Canada: 866-567-CODE (2633)

Mexico: 800-877-04444

Toll-free phone numbers for all other countries [Here](#) or can be obtained by following steps 1 through 4 below and selecting the international toll-free dialing instructions for the country desired.

#### Online:



1. Go to [www.ethicspoint.com](http://www.ethicspoint.com).
2. Click on "File a report."
3. Enter "Conagra" as the organization name.
4. Click "Submit."

#### Email:

Legal Department: Ethics & Compliance Team  
[legalethicsandcompliance@conagra.com](mailto:legalethicsandcompliance@conagra.com)

## • CONAGRA'S INVESTIGATIONS •

### CONAGRA'S RESPONSE TO REPORTS

We promptly investigate all reports of conduct suspected to violate the Code or the law to determine an appropriate course of action. Reports of violations or potential violations should include as much detailed information as possible to allow us to investigate and take appropriate responsive action. We may follow up with reporters for additional information and ask that reporters respond in a timely manner with complete and accurate information.

We will maintain confidentiality to the greatest extent possible, consistent with our need to investigate and to comply with other company obligations. We will not tolerate retaliation.

### SUPPLIERS' OBLIGATION TO COOPERATE WITH INVESTIGATIONS

As a condition of the supplier relationship, all suppliers are required to cooperate fully in any investigation. Keep in mind that you must never:

- Interfere with an investigation, including by providing false, misleading, or incomplete information.
- Conceal information or inappropriately discuss an investigation with others.
- Interfere with witnesses to a matter under investigation.
- Destroy or alter any information relevant to an investigation.
- Violate confidentiality directives.

### AUDITS, GOVERNMENT INQUIRIES, AND INVESTIGATIONS

Conagra and/or its designated agents maintain the right to inspect suppliers' production facilities and records to ensure compliance with this Supplier Code of Conduct. Suppliers must respond within the allotted time to all audits, assessments, and document requests related to the delivery of their products or services. Additionally, it is critically important that our suppliers respond appropriately to inquiries, investigations, and audits by regulatory bodies, law enforcement, or other governmental agencies.

### VIOLATING THE CODE, POLICY, OR THE LAW

Violations of this Supplier Code of Conduct may jeopardize a supplier's continuing business relationship with Conagra up to and including termination.

## COMPLYING WITH APPLICABLE LAWS

### HOW IT'S DONE

We do business with suppliers who operate around the world. We understand our suppliers are subject to many different laws, customs, and cultures. We seek to do business with suppliers who adhere to the highest ethical standards and respect and comply with applicable federal, state, and local laws, no matter where our suppliers operate. Conagra will never ask any of its suppliers to violate the law or compromise its standards of integrity to fulfill a business obligation to Conagra.

## PREVENTING BRIBERY AND CORRUPTION

### HOW IT'S DONE

Our suppliers must comply with the U.S. Foreign Corrupt Practices Act, (FCPA), the United Kingdom's Bribery Act, as applicable, and other relevant anti-bribery and anti-corruption laws and should not take any actions to violate, or cause their business partners to violate, any applicable anti-bribery and corruption laws.

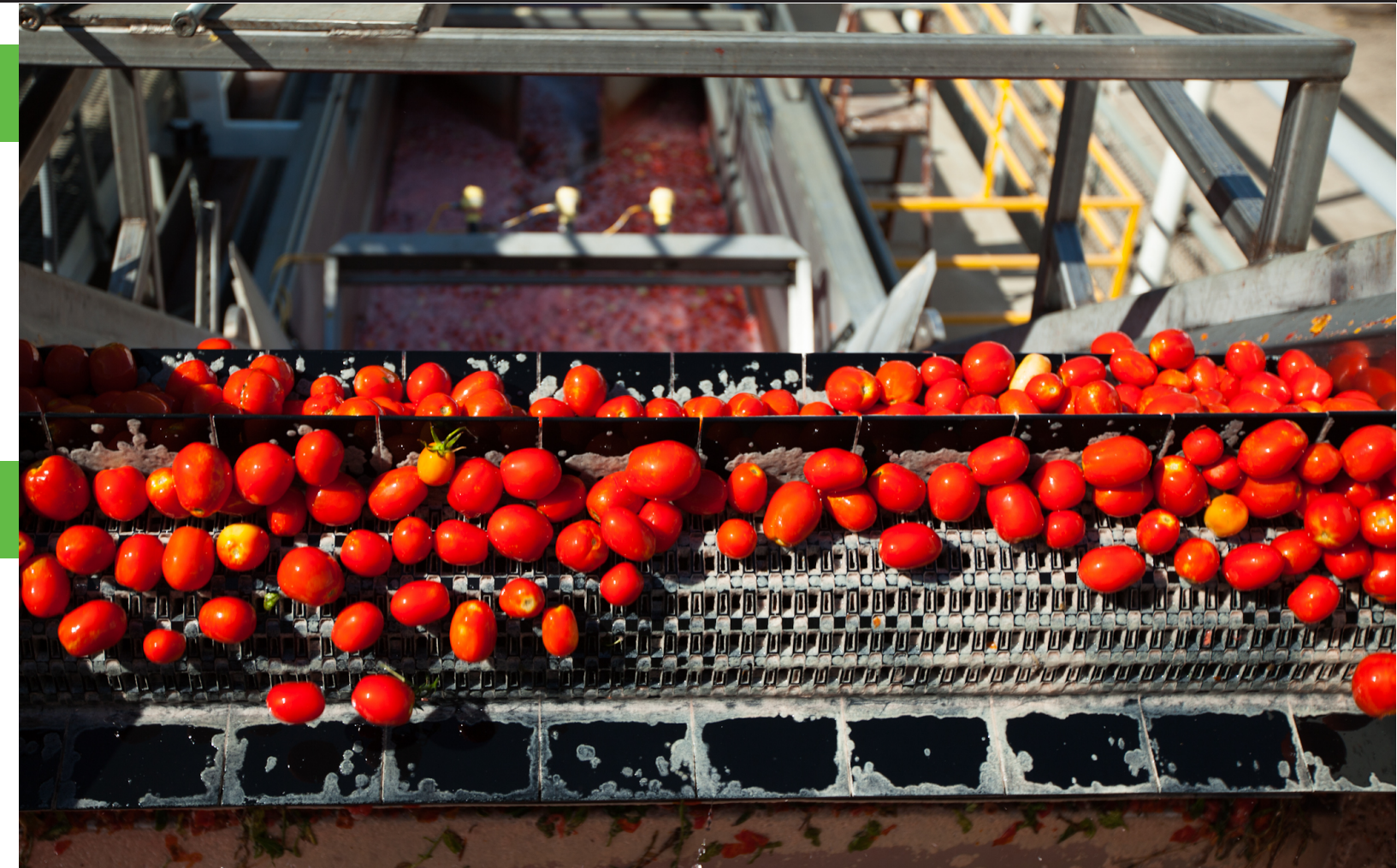
Conagra will never direct any of its suppliers or business partners to directly or indirectly offer, give, or accept any form of payment or incentive to gain an improper business advantage. In short, we never bribe, and we seek to avoid even the appearance of anything improper or corrupt in our business activities anywhere in the world.

Our suppliers must not engage in, or permit any form of, bribery (including facilitation payments), kickbacks, money laundering, extortion, embezzlement, fraud, or any other form of corruption.

A bribe occurs when someone gives or promises someone something of value to gain favorable treatment. Kickbacks involve giving or receiving personal payments as a reward for the awarding of a contract or facilitating another favorable outcome. Bribes and kickbacks of any kind are a violation of this Code and likely an illegal business transaction.

#### A BRIBE CAN TAKE THE FORM OF:

- Gifts or entertainment
- Meals
- Discounts
- Favors
- Cash or cash equivalents (e.g. gift cards)
- Charitable or political contributions
- Jobs or internships



### PREVENTING CORRUPTION

- Remember that bribes can take the form of anything of value, not just cash, that provides an advantage.
- Monitor your business partners closely to look for any warning signs of corruption.
- Be extra cautious when doing business with government officials.

Remember that "government official" can include any person acting in an official capacity on behalf of any national, regional or local government or any instrumentality of government such as:

- Elected officials
- Employees of government agencies
- Government-controlled companies or entities
- Officials in political parties



## • AVOIDING CONFLICTS OF INTEREST •

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Allowing personal interests or relationships to influence our business decisions is a conflict of interest. Unfortunately, even the appearance of a conflict of interest can be damaging. Conflicts can arise in dealings between Conagra employees and employees of our Suppliers. We ask that you not put Conagra employees in the position of making a decisions where their loyalties or motivations might be questioned. Situations where conflicts can occur include:

#### • BUSINESS COURTESIES

Do not exchange gifts, entertainment, or other business courtesies that might create the potential or appearance that an employee's business judgment may be influenced by personal gain. Our employees will not accept courtesies that exceed a nominal value or are outside customary business practices.

#### • PRODUCT SAMPLES

Giving and receiving product samples may be necessary and appropriate to enable informed business decisions, but be careful not to provide more than is necessary and not to provide samples for personal use to avoid the appearance of impropriety.

#### • PERSONAL RELATIONSHIPS

Our employees seek to establish professional and congenial relationships with the employees of our suppliers. However, personal relationships outside of work, including close friendships, family relationships, or romantic involvements must be disclosed to Conagra.

#### • TRADE SHOWS AND EDUCATION

We appreciate when our suppliers offer to sponsor our employees' attendance at relevant trade shows or educational conferences; however, we ask our suppliers to allow Conagra managers to determine who attends on Conagra's behalf and that our suppliers avoid lavish transportation, lodging, meals, or entertainment.



## • COMPETING FAIRLY •

### HOW IT'S DONE

At Conagra, we are committed to full and fair competition. We believe that a competitive marketplace is good for everyone. We let quality performance, not unfair business practices, drive our success. We expect our suppliers to comply with applicable law, including antitrust and competition laws, to ensure fair competition.

- Compete vigorously, but fairly, for Conagra's business.
- Avoid unlawful collaboration with your competitors or doing anything that could give the appearance of an improper agreement with competitors.
- Do not attempt to acquire competitive information or share Conagra's information with our competitors. Instead, analyze publicly available information, published data, and surveys.
- Do not attempt to provide Conagra with non-public, competitively sensitive information about our competitors, including pricing, promotion, or strategy information.

### DISCLOSING CONFLICTS

#### WHAT IF?

*My sister-in-law was just hired by Conagra and my employer is actively working to become selected as one of Conagra's suppliers. I am not part of the contracting process and I won't be a part of the relationship.*

*Do I need to say something?*

#### ANSWER

**Yes.**

Even if you believe there is no issue, the situation could appear to others as a conflict of interest resulting in negative consequences. Both you and your sister-in-law should report your relationship so any potential issues can be resolved.



# • RESPECTING PRIVACY AND CONFIDENTIALITY •

## HOW IT'S DONE

Conagra relies on our Suppliers to protect the confidentiality of the information we share with them. Conagra may share confidential information with Suppliers that Conagra develops, maintains, and uses related to Conagra's business, brands, products, suppliers, and customers. Such information is valuable and considered confidential because it is not known to the public and might be of use to competitors or harmful to Conagra, its employees, or customers if disclosed. Confidential Information can include:

- Intellectual property
- Personally identifiable information
- Financial information, such as costs and profit margins, financial forecasts, insider information, and financial results
- Sales and marketing information, such as consumer data, customer information, and contract terms
- Information about innovations

Suppliers are expected to protect Conagra's confidential information and share it only with its employees or representatives who need it for business purposes related to the Conagra-Supplier relationship, where permitted by law, and who are required to keep it secure.



### RESPECTING SECURITIES LAWS

Conagra is a publicly traded corporation and requires our suppliers to comply with securities laws with respect to Conagra's non-public information and trading in Conagra's securities. It is a violation of this Code, and potentially the law, to buy or sell Conagra securities on the basis of material inside information or to engage in any other action which takes advantage of inside information including tipping others.

### EXTERNAL COMMUNICATIONS

Communications made to third parties about the Conagra-Supplier relationship should only be made in collaboration with, and with the approval of, Conagra. Suppliers should also seek Conagra's approval before disclosing details about the Conagra-Supplier relationship during speaking engagements or in written publications, including websites and social media.

### OUR VALUES IN ACTION

#### To protect confidential information:

- Seek clarification from your Conagra representative if you're not sure whether something qualifies as confidential or non-public information.
- Only share confidential information with employees who need the information to conduct their jobs.
- Ensure that your employees are aware that Conagra is a publicly traded corporation and that the securities laws apply to trading in Conagra stock.
- Honor confidentiality agreements.
- Never use confidential information for the benefit of any person or entity besides Conagra.
- Ensure that your employees understand that protecting Conagra confidential information extends beyond their employment by Supplier.
- Immediately report unauthorized disclosure of confidential information, theft of confidential information, or abuse of confidential information to Conagra.



# • PROVIDING SAFE AND HIGH QUALITY PRODUCTS •

## HOW IT'S DONE

As an established industry leader, we recognize that nothing is more important than the safety and quality of our food. Our commitment to safety and quality extends to the ingredients and products we receive from our suppliers. At a minimum, this means that our suppliers are required to comply with all laws and adopt good manufacturing practices applicable to our business even if they go beyond the regulatory requirements. Where expectations and rules or regulations appear to conflict, Conagra expects its suppliers to adhere to the higher standard.

Conagra expects its suppliers to monitor the ingredients and products it provides to Conagra for safety and quality and to promptly report material issues to Conagra. Material issues include failing to meet recognized safety standards and defects in product labeling or instructions that increase the risk of unsafe use. In the case of food products, material issues include all product specification deviations and microbiological, chemical, or physical hazards that affect the safety of the product.

# • PROVIDING SAFE ENVIRONMENTS FOR WORKERS •

## HOW IT'S DONE

Conagra is committed to creating an environment where everyone feels safe and returns home at the end of the day unharmed. This is a team effort and we work together, use common sense, and follow applicable health and safety laws to keep our workers safe. We expect our suppliers to take steps to protect the safety and wellbeing of their workers by:

- Seeking to operate on an injury free basis
- Providing workers training and personal protection equipment in accordance with industry standards
- Implementing appropriate policies, controls, and programs to protect the safety, health, and well-being of workers consistent with all applicable workplace rules and regulations including applicable fire safety laws
- Maintaining their facilities to provide a safe, clean, and healthy work environment



WHAT IF?

*I think there may be a food safety issue with one of the ingredients we are providing to Conagra, but additional testing may push us behind schedule. What should I do?*

ANSWER

Never sacrifice food safety or quality to meet a deadline. Products that do not meet Conagra's food quality and safety standards will be rejected causing delay and waste. You should immediately report the matter to your manager and, if appropriate action is not taken, directly to Conagra.

# ENCOURAGING BELONGING

At Conagra, we are committed to cultivating an inclusive culture where every employee feels valued, respected and supported. We seek to achieve a high sense of belonging, where all of our employees feel integral to our journey.

We do not tolerate harassment or discrimination by anyone, including executives, officers, directors, supervisors, coworkers, suppliers, vendors, customers, or other business partners. We believe every employee should be treated with respect, and this environment of respect extends outside of work hours and beyond Conagra's property to wherever Conagra business is being conducted.

We expect our suppliers to encourage a work environment where workers are treated with dignity and respect and to prohibit 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, marital status, or veteran status, and any other categories protected by applicable law.

## HOW IT'S DONE

- Know and comply with all applicable laws related to discrimination and harassment
- Adopt strong policies regarding hiring, promotions, and workplace conduct
- Do not tolerate offensive or threatening behavior (verbal or physical) in the workplace
- Provide a mechanism for workers to speak up and report concerns including allowing for anonymity when appropriate
- Investigate and address reported concerns promptly; notify Conagra of any concerns that relate to our employees or stakeholders



**WHAT IF?**

*We received a report on our hotline that one of our employees was disrespectful when visiting Conagra's offices and the offensive conduct included referencing race and gender in a derogatory manner.*

**ANSWER**

Notify Conagra of the concern and collaborate on the investigation to ensure that the incident is investigated appropriately and that action is taken promptly to address the concerns. Neither employer should tolerate any form of retaliation for reports made in good faith.

# RESPECTING HUMAN RIGHTS

## HOW IT'S DONE

At Conagra, we respect human rights and we expect the same from our suppliers. We are committed to fair treatment of individuals in all of our operations and supply chain. Our approach requires compliance with all applicable laws and respect for 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 Organizations' Declaration on Fundamental Principles and Rights at Work, and guidelines for multinational enterprises from the Human Rights Task Team of the Organization for Economic Co-operation and Development.

We expect our suppliers to align their policies and practices with applicable laws and standards to respect human rights.

## RESPECTING HUMAN RIGHTS

- Comply with all applicable laws pertaining to child labor. Prohibit the use of child labor for hazardous work.
- Enter into only voluntary employment relationships with clear terms and conditions of employment that comply with applicable laws and regulations. Prohibit all forms of forced labor and any form of human trafficking. Comply with applicable immigration laws.
- Recognize all legal rights to organize and collectively bargain through a labor union, or to choose not to join a labor union, without fear or intimidation, harassment, or retaliation.
- Avoid abusive recruitment practices; prohibit recruiting firms from using coercive or abusive recruitment practices.
- Ensure employees have freedom of movement. Do not restrict movement by retaining identity papers, holding of deposits, creating accommodations requirements, or any other action aimed at restricting mobility.
- Comply with all applicable wage, benefits, working hours, meal and rest periods, time off, and overtime laws.
- Encourage workers and other stakeholders to report concerns and prohibit retaliation.
- Adopt strong policies regarding hiring, promotions, and workplace conduct.



### WHAT IF?

*I was working late the other night and saw that some of the night cleaning crew looked really young. These are not my company's employees; we use another company for these services.*

*It is not really my business, right? The kids did not seem unhappy . . .*

### ANSWER

**No.**  
Human rights in our supply chain is everyone's business. Notify your manager so that your company can engage with the other company on the potential issue. Preventing child labor, especially child labor performing potentially hazardous work is all of our business and responsibility.

## RESPONSIBLE SOURCING

### ENVIRONMENTAL RESPONSIBILITY

#### HOW IT'S DONE

Conagra Brands is committed to complying with environmental laws, responsible environmental practices, and striving to lessen the impact of our business on the environment. We seek to actively engage with our suppliers on our “better planet” and “responsible sourcing” pillars of our citizenship strategy. Our suppliers are critical to our success in achieving our sustainability goals.

We expect our suppliers to engage with us and to strive to help reduce the environmental impacts of their operations. At a minimum, this means our suppliers must comply with applicable laws and regulations. With respect to products and services provided to Conagra, we expect our suppliers to engage with us about steps they are taking to reduce emissions, eliminate waste, protect the environment, and preserve natural resources.

### ANIMAL CARE

#### HOW IT'S DONE

Conagra Brands is committed to encouraging the improvement of the welfare of animals in our supply chain. As a core principle of our approach, we are committed to promoting the five freedoms for animal welfare in our supply chain. At a minimum, this means our suppliers must comply with applicable laws and regulations on animal welfare. To encourage our suppliers to adopt high standards, and to provide guidance where there are no legal requirements, we have published our Conagra Brands Animal Welfare Position Statement.

Additionally, to support our initiatives, we may adopt commodity- or practice-specific standards for applicable suppliers based on scientific research, available technology, and industry best practices.

#### Additional Resources

To provide our suppliers with more information about our expectations, we publish additional information under Corporate Social Responsibility on our website, [www.Conagrabrands.com](http://www.Conagrabrands.com) about our citizenship strategy including:

- [Better Planet](#)
- [Good Food](#)
- [Responsible Sourcing](#)
- [Animal Welfare Position Statement](#)



#### WHAT IF?

*I recently learned that one of the parts we used for an installation at Conagra has a design flaw that may allow potentially harmful fluid leaks. What should I do?*

#### ANSWER

**You should speak up.** Whenever you learn of an issue that could be harmful to people or the environment, you should contact your Conagra representative or our Hotline to reach our EHS team.

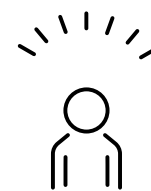
## • SUPPLIER ENGAGEMENT •

At Conagra, we know we need to work together with our suppliers to meet the expectations of our consumers, customers, competitors, employees, and investors. We must be relentless in adapting to our changing legal and competitive landscape. We must treat each other with respect, and we must conduct business in a way that merits trust and respect.

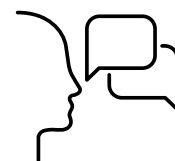
Conagra can't succeed without our suppliers and we rely on you to:

- **KEEP ACCURATE RECORDS** - ensure that transactions with Conagra are properly documented and maintain accurate and complete business and financial records.
- **DOCUMENT YOUR COMPLIANCE WITH THIS SUPPLIER CODE OF CONDUCT** - share information with us to help us validate your compliance with contractual commitments and this Supplier Code of Conduct.
- **COOPERATE WITH INSPECTIONS, AUDITS, INVESTIGATIONS** - allow us to inspect your relevant facilities, understand your operations, audit your compliance, and complete investigations into concerns.

## • QUESTIONS •



**COLLABORATE** with your **CONAGRA RELATIONSHIP PARTNER**



**REPORT A CONCERN** through the **CONAGRA ETHICS & COMPLIANCE HOTLINE**

**Phone:**

United States and Canada: 866-567-CODE (2633)

Mexico: 800-877-0444

**Online:** [www.ethicspoint.com](http://www.ethicspoint.com)

**Email:** [legalethicsandcompliance@conagra.com](mailto:legalethicsandcompliance@conagra.com)