

# Conagra Brands CDP Water Security 2020 Report



**DISCLOSURE INSIGHT ACTION**

## W0. Introduction

### W0.1

(W0.1) Give a general description of and introduction to your organization.

Conagra Brands, Inc. (NYSE: CAG), headquartered in Chicago, is one of North America's leading branded food companies. Guided by an entrepreneurial spirit, Conagra Brands combines a rich heritage of making great food with a sharpened focus on innovation. The company's portfolio is evolving to satisfy people's changing food preferences. Conagra Brands iconic brands, such as Marie Callender's®, Reddi-wip®, Hunt's®, Healthy Choice®, Slim Jim® and Orville Redenbacher's®, as well as emerging brands, including Alexia®, Blake's® and Frontera®, offer choices for every occasion. At Conagra Brands, corporate social responsibility is a natural extension of our purpose and operating principles. We have identified four strategic focus areas that reflect and articulate our values as a responsible corporate citizen: Good Food, Stronger Communities, Better Planet and Responsible Sourcing. Within each of these areas, we focus on issues that are most material to our business and stakeholders and most meaningful to our role in the industry, the marketplace and our environment.

### W-FB0.1a

(W-FB0.1a) Which activities in the food, beverage, and tobacco sector does your organization engage in?

Processing/Manufacturing

### W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	June 1 2018	May 31 2019

### W0.3

(W0.3) Select the countries/areas for which you will be supplying data.

Canada  
Mexico  
United States of America

### W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

USD

### W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups over which operational control is exercised

### W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

Yes

### W0.6a

(W0.6a) Please report the exclusions.

Exclusion	Please explain
Conagra Brands' reported water footprint includes water use from all manufacturing locations and headquarter facilities where data is available. A limited number of facilities are excluded from this disclosure because they were sold or closed; have unmetered wells; or are dry facilities with immaterial water use. Excluded facilities include: Streator, Mattoon, and Concord (sold/closed); Brookston and Lakeview (dry facilities); and Denver, Aurora, Richmond and Macomb, where water use data was unavailable for FY19 but is expected to be immaterial. Leased facilities, including Conagra Brands Chicago headquarters and Omaha campus and sales offices, are also excluded. Water use at these locations is not material compared to water use at our food production locations. The following joint ventures are not within our operational control and are not included in the reporting boundary: Ardent Mills LLC (US), Productos de Verde Valle, sa de cv (Mexico), Hunt-Universal Robina Corp. (Philippines), and Agro Tech Foods Limited (India).	Water data from leased offices and a limited number of manufacturing sites are excluded due to the lack of available data and limited water use at these locations. Based on activity at these locations, we do not believe these to be a material omission.

W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Vital	Important	Our manufacturing facilities must have access to clean water to operate. Water is used as an ingredient in many of our products, it is critical for sanitation and food safety, and is often a key part of food preparation through heating, cooling or moving food through production steps. The "vital for operations" importance rating was selected because we would not be able to produce our products without clean water. Our suppliers and contracted growers also depend on the availability of water to grow crops and produce the raw materials needed for making our food. Similarly, this dependency provides basis for selecting the "important" rating for indirect water use. Provided that our network of suppliers and contracted growers remains the same, we do not anticipate that our organization's dependence on good quality freshwater will differ over time. We expect continuing pressure on global water supply which puts pressure on agricultural systems from where we source our ingredients.
Sufficient amounts of recycled, brackish and/or produced water available for use	Not very important	Not very important	Conagra Brands uses water sourced from recycled, brackish, and/or produced water in select manufacturing locations which utilize on-site wastewater treatment. This recycled water allows us to reduce the amount of freshwater used in certain unit operations where food safety is not a risk and freshwater is not a requirement, such as cleaning wastewater treatment filter screens. The rating of "not very important" was selected as the number of sites that are able to utilize recycled water is limited. Likewise, it was determined that the use of recycled, brackish, and/or produced water available for our suppliers' indirect use is "not very important" in contrast to the availability of sufficient amounts of good quality freshwater to grow crops and produce the raw materials needed for making our food. We do not anticipate that our organizations' dependency on sufficient amounts of recycled, brackish and/or produced water will differ over time, consistent with our industry.

W-FB1.1a

(W-FB1.1a) Which water-intensive agricultural commodities that your organization produces and/or sources are the most significant to your business by revenue? Select up to five.

Agricultural commodities	% of revenue dependent on these agricultural commodities	Produced and/or sourced	Please explain
Cattle products	10-20	Sourced	Conagra Brands considers this commodity to have significant revenue impact due to current portfolio use (noted by percentage of revenue dependent metric), and broader corporate reputation and investor confidence revenue impacts associated with sustainable sourcing of this commodity. Water intensity of this commodity is one of several environmental factors tied to this ingredient. We approach sustainable sourcing holistically. Beef is the primary ingredient in Duke's®, Slim Jim® meat snacks and Hebrew National® kosher franks. It is also an ingredient in select Banquet® and Marie Callender's® offerings, Chef Boyardee® beef ravioli and other canned pasta products. The range given is an estimate based on best available data.
Palm oil	Less than 10%	Sourced	Conagra Brands considers this commodity to have significant revenue impact due to current portfolio use (noted by percentage of revue dependent metric), and broader corporate reputation and investor confidence revenue impacts associated with sustainable sourcing of this commodity. Water intensity of this commodity is one of several environmental factors tied to this ingredient. We approach sustainable sourcing holistically. Palm oil is primarily used in Orville Redenbacher's® and ACT II® microwave popcorn, margarine products, Swiss Miss and Hunt's® Snack Pack puddings, and peanut butter. The range given is an estimate based on best available data.
Other, please specify (Paper/Pulp)	More than 80%	Sourced	Conagra Brands considers this commodity to have significant revenue impact due to current portfolio use (noted by percentage of revue dependent metric), and broader corporate reputation and investor confidence revenue impacts associated with sustainable sourcing of this commodity. Water intensity of this commodity is one of several environmental factors tied to this ingredient. We approach sustainable sourcing holistically. Fiber-based packaging is used for virtually all of our products for distribution packaging and for many of our products in primary or secondary packaging, e.g. microwave popcorn bags and folding cartons for single serve frozen meals. The range given is an estimate based on best available data.
Soy	Less than 10%	Sourced	Conagra Brands considers this commodity to have significant revenue impact due to current portfolio use (noted by percentage of revue dependent metric), and broader corporate reputation and investor confidence revenue impacts associated with sustainable sourcing of this commodity. Water intensity of this commodity is one of several environmental factors tied to this ingredient. We approach sustainable sourcing holistically. Soy products are mainly used as ingredients in Gardein(R) meat replacement products, margarine spreads, oils, Banquet® frozen products, Marie Callender's® pies, Chef Boyardee® canned pasta products, Healthy Choice® frozen meals, and Slim Jim® meat snacks.

W1.2

**(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?**

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	100%	Conagra Brands measures the total volume of water withdrawal on a monthly basis for all facilities using the Sustainable Development Reporting Tool, our proprietary, sustainability metric database and reporting system. Water withdrawal is reported monthly to management at the company, business unit, and facility level as part of our operations period review meetings.
Water withdrawals – volumes by source	100%	Conagra Brands measures the total volume of water withdrawal by source on a monthly basis for all facilities, using the Sustainable Development Reporting Tool, our proprietary, sustainability metric database and reporting system. Water withdrawal sources applicable to our facilities include surface water, well water, and municipal water. Water withdrawal by source is included in the monthly report to management at the company, business unit, and facility level as part of our operations period review meetings.
Entrained water associated with your metals & mining sector activities - total volumes [only metals and mining sector]	<Not Applicable>	<Not Applicable>
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	<Not Applicable>	<Not Applicable>
Water withdrawals quality	100%	Conagra Brands measures the quality of water withdrawal on a weekly, monthly and annual basis at all facilities in accordance with our water policy.
Water discharges – total volumes	100%	Conagra Brands measures the total volume of water discharge on a monthly basis for all facilities, using the Sustainable Development Reporting Tool, our proprietary, sustainability metric database and reporting system.
Water discharges – volumes by destination	100%	Conagra Brands measures the total volume of process water discharge by destination on a monthly basis for all facilities, using the Sustainable Development Reporting Tool, our proprietary, sustainability metric database and reporting system. Water discharge destinations applicable to our facilities include publicly owned treatment works (POTW), land/irrigation, and direct discharge.
Water discharges – volumes by treatment method	100%	Conagra Brands measures and monitors process water discharge volume by treatment method on a monthly basis for all facilities. For our locations, there is direct correlation between process water discharge by destination and by treatment method. For example, over 70 percent of our process water discharge is sent to local POTWs, which is both a destination and treatment method.
Water discharge quality – by standard effluent parameters	76-99	Approximately 90 percent of Conagra Brands facilities operate under a site-specific wastewater discharge permit, which requires these locations to regularly measure and monitor water discharge quality data to ensure compliance with specified parameters. The remaining facilities are not required to have discharge permits due to quantity discharged and do not have on-site metering such as our bulk popcorn facility in Lake View, Iowa.
Water discharge quality – temperature	26-50	Conagra Brands measures water discharge temperature in accordance with all applicable permits.
Water consumption – total volume	76-99	Conagra Brands has started working on site-specific projects to map water usage throughout the facility including any water consumed in our products. In FY15 we began pulling water consumption reports from our manufacturing database, detailing water consumed in our product recipes for our US based facilities. Where site specific monitoring is not possible, consumption is estimated based on withdrawals less discharges.
Water recycled/reused	1-25	Conagra Brands standard procedure is reusing heating and cooling water wherever appropriate. Where applicable, Conagra Brands measures the volumes and quality of water recycled/reused on a monthly basis, using our sustainable development reporting system, our proprietary, sustainability metric database and reporting system.
The provision of fully-functioning, safely managed WASH services to all workers	100%	Conagra Brands provides access to full-functioning Water, Sanitation and Hygiene (WASH) services for all employees as it is critical to our business and food safety & quality standards we adhere to. Since access to fully functioning WASH services for all workers is included in our health and safety inspections and certificates, all our facilities regularly measure and monitor this metric during health and safety audits.

**W1.2b**

**(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?**

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	18282	Higher	Water withdrawals at our facilities are used for purposes such as moving product, washing ingredients, cooking food, and cleaning equipment. Total water withdrawals in FY19 increased due to the acquisition of Pinnacle foods and the addition of 11 new facilities into our water inventory compared to last year's disclosure. Total withdrawals are expected to remain roughly the same in the future. Thresholds used include: <-51% change: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.
Total discharges	16489	Higher	Water discharges from Conagra facilities are directed to municipal treatment facilities, direct discharge, or land application based on the facility and in accordance with local permitting and regulation. Wastewater discharges increased in FY19 due to the acquisition of Pinnacle foods and the addition of 11 new facilities into our water inventory compared to last year's disclosure. Total discharge is expected to remain roughly the same in the future. Thresholds used include: <-51% change: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.
Total consumption	1793	About the same	Water consumption was calculated based on the difference between withdrawals and discharges. At some facilities water meter data was not available in FY19, so discharge volumes were assumed to be equal to withdrawals, although actual discharges may have been lower. Water consumption remained about the same from the previous reporting year and is not expected to change significantly in the near future. Thresholds used include: <-51% change: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.

**W1.2d**

(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	Yes	11-25	Lower	WRI Aqueduct	Conagra Brands defines water withdrawals sourced from a water stressed area as the sum of municipal, groundwater and surface water sourced from geographic areas where Baseline Water Stress categorized by the WRI Aqueduct tool as equal to or greater than high (40-100%). Conagra Brands' facilities in Irapuato, MX and Oakdale, CA are located in areas defined as water stressed in FY2019. These high-stress areas have changed from our FY2017 risk assessment, which identified our Hamburg, Menomonie, Milton, and Russellville locations as high-stress. The proportion of water sourced from high-stress areas decreased from 22% in FY18 to 15% in FY19, which can be largely attributed to changing high-risk areas within the Aqueduct Water Risk Atlas, which is updated annually. Thresholds used include: <-51% change: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.

## W-FB1.2e

(W-FB1.2e) For each commodity reported in question W-FB1.1a, do you know the proportion that is produced/sourced from areas with water stress?

Agricultural commodities	The proportion of this commodity produced in areas with water stress is known	The proportion of this commodity sourced from areas with water stress is known	Please explain
Cattle products	Not applicable	Yes	Water stressed areas are identified through Conagra Brands' use of WRI's Aqueduct global water risk mapping tool. We currently use the Food & Beverage weighting scheme and assess supplier locations as part of our sustainable sourcing program. We annually review ag-level sourcing geographies for this commodity against WRI Aqueduct water risk areas to identify sourcing areas originating from water-stressed locations. To mitigate the risk, we evaluate individual supplier efforts to track, disclose and manage water risk via an annual Supplier Excellence program sustainability assessment scorecard that includes review of water conservation targets and progress.
Palm oil	Not applicable	Yes	Water stressed areas are identified through Conagra Brands' use of WRI's Aqueduct global water risk mapping tool. We currently use the Food & Beverage weighting scheme and assess supplier locations as part of our sustainable sourcing program. We annually review ag-level sourcing geographies for this commodity against WRI Aqueduct water risk areas to identify sourcing areas originating from water-stressed locations. To mitigate the risk, we evaluate individual supplier efforts to track, disclose and manage water risk via an annual Supplier Excellence program sustainability assessment scorecard that includes review of water conservation targets and progress.
Other commodities from W-FB1.1a, please specify (Paper/Pulp)	Not applicable	Yes	Water stressed areas are identified through Conagra Brands' use of WRI's Aqueduct global water risk mapping tool. We currently use the Food & Beverage weighting scheme and assess supplier locations as part of our sustainable sourcing program. We annually review ag-level sourcing geographies for this commodity against WRI Aqueduct water risk areas to identify sourcing areas originating from water-stressed locations. To mitigate the risk, we evaluate individual supplier efforts to track, disclose and manage water risk via an annual Supplier Excellence program sustainability assessment scorecard that includes review of water conservation targets and progress.
Soy	Not applicable	Yes	Water stressed areas are identified through Conagra Brands' use of WRI's Aqueduct global water risk mapping tool. We currently use the Food & Beverage weighting scheme and assess supplier locations as part of our sustainable sourcing program. We annually review ag-level sourcing geographies for this commodity against WRI Aqueduct water risk areas to identify sourcing areas originating from water-stressed locations. To mitigate the risk, we evaluate individual supplier efforts to track, disclose and manage water risk via an annual Supplier Excellence program sustainability assessment scorecard that includes review of water conservation targets and progress.

## W-FB1.2g

(W-FB1.2g) What proportion of the sourced agricultural commodities reported in W-FB1.1a originate from areas with water stress?

Agricultural commodities	% of total agricultural commodity sourced from areas with water stress	Please explain
Cattle products	26-50	Conagra Brands sources beef from the United States, Australia, Brazil, Canada, Uruguay. Percentage Conagra Brands sourced from water stressed areas represents an approximation of major production regions for this commodity that fall into medium – extremely high-risk areas on the 2019 WRI Aqueduct Water Risk Atlas. Australia is the most water-stressed geography we source from, but represents a very small part of our overall beef sourcing. The percentage sourced from areas of water stress is unchanged from last year's CDP report, though we source from suppliers that have water conservation targets and water use reduction strategies in place. Under a "business-as-usual" scenario of relatively unconstrained emissions, where global temperatures increase 2.6–4.8°C by 2100 relative to 1986–2005 levels, 2019 WRI Aqueduct maps indicate that these areas are expected to remain at near normal water stress or experience a 1.4x increase through 2045 in select pockets.
Palm oil	0%	Ceres' Know the Chain investor brief on palm oil risk indicates that the commodity in general is at low risk for water use and pollution. Conagra Brands sources palm oil from parts of Indonesia and Malaysia that fall into low-risk areas on the WRI Aqueduct Water Risk Atlas. This represents a 5% reduction in percent of commodity sourced from areas of high water stress since last year. Under a business as usual climate scenario, 2019 WRI Aqueduct maps indicate Indonesia and Malaysia are expected to remain at low levels of water stress through 2030 and 2040.
Soy	26-50	Conagra Brands sources soy products from the Midwest United States, including Illinois and Indiana. Percentage Conagra Brands sourced from water stressed areas represents an approximation of major production regions for this commodity that fall into medium – extremely high-risk areas on 2019 WRI Aqueduct Water Risk Atlas. The percentage sourced from areas of water stress is unchanged from last year's CDP report, though we source from suppliers that have water conservation targets and water use reduction strategies in place. Under a business as usual climate scenario, 2019 WRI Aqueduct maps indicate these areas are expected to remain at near normal water stress or experience a 1.4x increase through 2045 in select pockets.
Other sourced commodities from W-FB1.2e, please specify (Paper/Pulp)	11-25	Timber used to produce Conagra Brands distribution packaging (primary, secondary and tertiary) is sourced from Canada and the United States. Percentage sourced from water stressed areas represents an approximation of regional sourcing that falls into medium – extremely high-risk areas on the 2019 WRI Aqueduct Water Risk Atlas. The percentage sourced from areas of water stress is unchanged from last year's CDP report, though we source from suppliers that have water conservation targets and water use reduction strategies in place. Under a business as usual climate scenario, 2019 WRI Aqueduct maps indicate these areas are expected to remain at near normal water stress or experience a 1.4x increase through 2045 in select pockets.

W1.2h

(W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Relevant	571	Higher	Our Menomonie, WI facility relies on fresh surface water for non-contact cooling purposes. Total freshwater use increased slightly (approximately 6%) the acquisition of additional facilities that use fresh surface water as a source. We expect surface water withdrawals to remain about the same in the future. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.
Brackish surface water/Seawater	Not relevant	<Not Applicable>	<Not Applicable>	Total brackish surface water/seawater withdrawal was 0 in the reporting year, as it was in the previous reporting year. We expect this withdrawal amount to remain the same into the foreseeable future. Withdrawal from this source is not relevant to the locations where Conagra Brands is currently operating.
Groundwater – renewable	Relevant	6376	Higher	Several Conagra Brands locations rely on the use of groundwater for production. Total groundwater use increased over last year due to acquisition of Pinnacle Foods and the inclusion of additional facilities in our water inventory that source groundwater. We expect surface water withdrawals to remain about the same or decrease in the future due to changes in our facility portfolio. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.
Groundwater – non-renewable	Not relevant	<Not Applicable>	<Not Applicable>	Conagra Brands does not operate in locations that use non-renewable groundwater so the total withdrawal from this source is 0. This is expected remain the same into the foreseeable future.
Produced/Entrained water	Not relevant	<Not Applicable>	<Not Applicable>	Conagra Brands does not have operations that produce or use produced water, so the total withdrawal from this source is 0. This is expected remain the same into the foreseeable future.
Third party sources	Relevant	11335	Higher	Most Conagra Brands locations source water from municipal supplies. In the last year, the amount of water sourced from municipal supplies increased approximately 13% due to the acquisition of Pinnacle Foods such that our FY19 water inventory includes 11 additional facilities over FY18. In the future we expect total municipal water volumes to remain about the same. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.

W1.2i

(W1.2i) Provide total water discharge data by destination.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water	Relevant	3864	Much higher	Several facilities direct discharge wastewater to fresh surface water in compliance with local regulation. Water discharges increased since FY2018 due to the acquisition of Pinnacle Foods and additional facilities that direct discharge to surface water. We expect this volume to remain about the same in the future. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.
Brackish surface water/seawater	Not relevant	<Not Applicable>	<Not Applicable>	Conagra Brands does not have facilities that discharge to brackish surface water or seawater so this destination is not relevant. We expect this discharge amount to remain the same into the foreseeable future.
Groundwater	Relevant	2872	Much higher	Several facilities, including our Irapuato and Oakdale facilities, discharge wastewater to groundwater via land irrigation. Groundwater discharge volumes increased since FY2018 due to the acquisition of Pinnacle Foods and additional facilities that discharge via land application. We expect this volume to remain about the same in the future. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.
Third-party destinations	Relevant	9753	Lower	Most Conagra Brands facilities discharge wastewater to publicly owned treatment works (POTW). POTW discharge decreased approximately 12% from FY18 due to the closure of our Memphis facility. We expect POTW discharge volumes to remain about the same in the future. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.

W-FB1.3

(W-FB1.3) Do you collect/calculate water intensity for each commodity reported in question W-FB1.1a?

Agricultural commodities	Water intensity information for this produced commodity is collected/calculated	Water intensity information for this sourced commodity is collected/calculated	Please explain
Cattle products	Not applicable	Yes	
Palm oil	Not applicable	Yes	
Soy	Not applicable	Yes	
Other commodities from W-FB1.1a, please specify (Paper/Pulp)	Not applicable	Yes	

W-FB1.3b

(W-FB1.3b) Provide water intensity information for each of the agricultural commodities identified in W-FB1.3 that you source.

**Agricultural commodities**

Cattle products

**Water intensity value (m3)**

14191

**Numerator: Water aspect**

Total water consumption

**Denominator**

Tons

**Comparison with previous reporting year**

This is our first year of measurement

**Please explain**

This value is from best available industry data on the water footprint of beef production in the U.S., our largest sourcing region. This data includes the estimated blue, green, and grey water footprint of beef production as calculated in Mekonnen, Mesfin M., and Arjen Y. Hoekstra. "A global assessment of the water footprint of farm animal products." *Ecosystems* 15.3 (2012): 401-415. found here: <https://doi.org/10.1007/s10021-011-9517-8> Due to supply chain complexity and variability, this estimate is based on industry averages that include our supply base. We expect water intensity for production of this commodity to decrease as the industry continues to improve best practices and new technology becomes available. Water intensity is used internally to track commodity-specific improvements in line with our supplier code of conduct requirements, which requires all suppliers to protect water resources through restorative or conservation efforts.

**Agricultural commodities**

Palm oil

**Water intensity value (m3)**

707.2

**Numerator: Water aspect**

Freshwater consumption

**Denominator**

Tons

**Comparison with previous reporting year**

This is our first year of measurement

**Please explain**

Metric was calculated using best available industry data for palm oil production in the areas from which we source, Indonesia and Malaysia, averaged based on the percent of supply from the applicable sourcing area. Data used is the most recent peer-reviewed research (water footprint assessment of oil palm in Malaysia, American Institute of

Physics, 2014; and water footprint and crop water usage of oil palm in Central Kalimantan, Indonesia, Water 11.1, 2019). Due to supply chain complexity and variability, this estimate is based on industry averages that include our supply base. We expect water intensity for production of this commodity to decrease as the industry continues to improve best practices and new technology becomes available. Water intensity is used internally to track commodity-specific improvements in line with our supplier code of conduct requirements, which requires all suppliers to protect water resources through restorative or conservation efforts.

---

#### Agricultural commodities

Soy

#### Water intensity value (m3)

0.77

#### Numerator: Water aspect

Freshwater withdrawals

#### Denominator

Other, please specify (Unit of production - acre-in per bushel)

#### Comparison with previous reporting year

This is our first year of measurement

#### Please explain

This value is from best available industry data on soy production in the U.S. as reported in the Field to Market National Indicators report. Source: <https://fieldtomarket.org/national-indicators-report-2016/soybeans/> Due to supply chain complexity and variability, this estimate is based on industry averages that include our supply base. We expect water intensity for production of this commodity to decrease as the industry continues to improve best practices and new technology becomes available. Water intensity is used internally to track commodity-specific improvements in line with our supplier code of conduct requirements, which requires all suppliers to protect water resources through restorative or conservation efforts.

---

#### Agricultural commodities

Other sourced commodities from W-FB1.3, please specify (Paper Fiber)

#### Water intensity value (m3)

1603

#### Numerator: Water aspect

Total water consumption

#### Denominator

Tons

#### Comparison with previous reporting year

This is our first year of measurement

#### Please explain

This value is calculated from best available industry data on the water footprint of paperboard in the U.S., our primary sourcing region, as reported in Van Oel, P. R., and A. Y. Hoekstra. "Towards quantification of the water footprint of paper: a first estimate of its consumptive component." Water resources management 26.3 (2012): 733-749. Found here: <https://doi.org/10.1007/s11269-011-9942-7>. Due to supply chain complexity and variability, this estimate is based on industry averages that include our supply base. We expect water intensity for production of this commodity to decrease as the industry continues to improve best practices and new technology becomes available. Water intensity is used internally to track commodity-specific improvements in line with our supplier code of conduct requirements, which requires all suppliers to protect water resources through restorative or conservation efforts.

---

### W1.4

#### (W1.4) Do you engage with your value chain on water-related issues?

Yes, our suppliers

Yes, our customers or other value chain partners

---

### W1.4a

---



(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?

Row 1

% of suppliers by number

1-25

% of total procurement spend

51-75

Rationale for this coverage

We address water, climate change and deforestation risks with the most strategic suppliers relevant to our business –those who have a significant and measurable impact on our ability to source, manufacture and distribute products. Conagra Brands requests water-related information for ingredients where we have direct relationships with farmers and as part of our Supplier Excellence Program, which gathers sustainability information from key suppliers that represent 75% of our procurement spend on ingredients and packaging. This program measures supplier performance on a diverse set of social and environmental metrics, including disclosure and management of water related risks. We apply a scoring system in this program that allows us to quantitatively measure supplier progress over time. Incentives for suppliers include recognition through an awards program as well as increased collaboration with Conagra Brands as we are using the information to drive business partnerships.

Impact of the engagement and measures of success

We ask tomato grower suppliers to report percentage of acres utilizing drip irrigation systems to indicate reduced water use compared to traditional furrow irrigation systems. Success is measured as a high percentage of contracted acres utilizing drip irrigation, resulting in a decrease in land needed to produce equivalent tomato yields. Our tomato growers have installed drip irrigation systems for at least 91% of contracted acres, reducing water use by nearly 15% and increasing yield by ~30% per acre, meaning that without drip irrigation, our growers would have needed to farm an additional 7,000 acres. Conagra Brands uses this information to better understand supplier performance and supply chain risks, and recognize suppliers with strong sustainability programs in our annual Supplier Excellence Program Sustainable Award program.

Comment

## W1.4b

(W1.4b) Provide details of any other water-related supplier engagement activity.

Type of engagement

Incentivizing for improved water management and stewardship

Details of engagement

Water management and stewardship is integrated into supplier evaluation processes

Water management and stewardship is featured in supplier awards scheme

% of suppliers by number

Less than 1%

% of total procurement spend

51-75

Rationale for the coverage of your engagement

The Supplier Excellence Program applies to our top direct material suppliers, which includes 60 suppliers, representing approximately 75% of our overall spend on food ingredients, commodities and packaging direct material spend. Focusing our supplier management efforts and water, climate and deforestation risk on this supplier subset provides the greatest impact and most efficient use of internal management resources.

Impact of the engagement and measures of success

The sustainability assessment within Conagra Brands Supplier Excellence Program awards 0-4 points to each supplier based on sustainability metrics addressing transparency, sustainability policies, goals, and public disclosure via GRI-compliant sustainability reports and/or CDP Water, Climate Change (Investor) and Forests disclosures. Companies with the highest scores in this assessment are eligible to receive the annual Supplier Excellence Sustainability award. Our first award for this program was announced in August 2018 and was given to a supplier with successful implementation of regenerative agriculture practices in the supply chain. The outcomes of this program for Conagra lead to a better understanding of our supplier performance and risks, and opportunities for strengthening supplier relationships based on sustainability.

Comment

## W1.4c

(W1.4c) What is your organization's rationale and strategy for prioritizing engagements with customers or other partners in its value chain?

Conagra Brands prioritizes engagements with customers and other value chain partners on water-related issues based on potential impact of engagement. Our wider value chain partners include employees, investors, NGOs, regulators and technology partners. Engaging with these value chain partners on water-related issues is essential for Conagra Brands to understand the current and future risks and opportunities associated with these relationships. Conagra Brands directly engages customers through our annual sustainability summit and periodically through supplemental customer working groups. Conagra Brands shares water management best practices and enables customers to make progress on their own sustainability goals. Although our product mix does not require customers to use much additional water, our engagement with them results in stronger relationships and new business opportunities. Conagra Brands addresses water risk on the employee level through training, which is available to all employees through our e-learning system. The courses on water and wastewater awareness help engage and test employee knowledge. Progress on training is used to measure success and is reported to Environmental Managers and Environmental Platform Directors monthly. By responding to CDP's Water Security Questionnaire, Conagra Brands provides investors with important information on water risk. This information is also distributed from senior leadership on an annual basis to investors and is publicly available on our the Conagra Brands website. Successful engagement with our investors is measured as a positive response to our CDP Water Security Questionnaire. Conagra Brands engages with NGOs on water risk by providing grants to environmentally focused non-profit organizations through our internal Sustainable Development Awards program. An engagement within the past few years was to help fund drought research at the University of California, Davis.

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?

No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

Yes, fines, enforcement orders or other penalties but none that are considered as significant

W2.2a

(W2.2a) Provide the total number and financial value of all water-related fines.

Row 1

Total number of fines

1

Total value of fines

1500

% of total facilities/operations associated

2

Number of fines compared to previous reporting year

Lower

Comment

W3. Procedures

W-FB3.1

(W-FB3.1) How does your organization identify and classify potential water pollutants associated with its food, beverage, and tobacco sector activities that could have a detrimental impact on water ecosystems or human health?

Conagra Brands' Hazard Communication Policy and Environment, Health & Safety (EHS) Manual outline the process for identifying and classifying potential water pollutants that may have detrimental impacts over water bodies and ecosystems. In our case, potential water pollutants would be any hazardous chemicals formed during processing, storage and distribution. As we rely on the availability of quality water resources to grow raw ingredients and process finished goods, considering the impacts on water bodies, ecosystems and human health caused by potential pollutants is of utmost importance.

Each Conagra Brands facility maintains a list of hazardous chemicals with supplemented Safety Data Sheets (SDS). All chemicals and SDS are captured in a corporatewide on-line storage system. Through an established chemical clearance process, each department assigns an employee responsible for tracking chemicals and determining if incoming chemicals are in the corporate system. If not in the system, chemical risks to health and environment are reviewed and evaluated to determine any hazards that may pose a risk either to the environment or our employees. This review is accomplished by an internal team of subject matter experts.

Our EHS team members who are responsible for chemical clearance are trained in basic hazard identification to determine which chemicals pose potential hazards to ecosystems and human health. Ecosystem-related impacts regularly considered include; aquatic ecotoxicity, aquatic acidification, and aquatic eutrophication. Health related impacts regularly considered include; acute toxicity, respiratory or skin sensitization, carcinogenicity, reproductive toxicity, organ toxicity single and repeated, aspiration hazard, asphyxiants, skin irritation, and eye damage.

Water related impacts considered vary across our value chain. In our direct operations, the risk of discharge of pollutants in facility wastewater is considered through the EHS review process. Within our supply chain, potential pollutant impacts vary widely depending on crop/product type and location. In general, agricultural processes in our supply chain may cause water-related impacts such as eutrophication or aquatic ecotoxicity due to the presence of fertilizers and pesticides in farmland runoff. These are managed through supplier dialogues around improving sustainability practices and our Supplier Code of Conduct, which requires all suppliers to protect water resources through restorative or conservation efforts, and act in an environmentally responsible manner. Our Supplier Code of Conduct requires that all suppliers comply with environmental laws and regulations, including those related to potential water pollutants, and remediate any environmental problems they may cause. Legal compliance of our suppliers is monitored continuously.

W-FB3.1a

(W-FB3.1a) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your food, beverage, and tobacco sector activities.

**Potential water pollutant**

Fertilizers

**Activity/value chain stage**

Agriculture – supply chain

**Description of water pollutant and potential impacts**

In agriculture, applying nutrients to promote plant growth can cause eutrophication in water bodies when fertilizers are picked up in runoff or leached through the soil. This can be caused by over-use or improper timing of fertilizer application, or due to extreme precipitation causing excess runoff. The magnitude of the impact of eutrophication varies by region, but can present a risk to water bodies globally. In the Midwest and Southeast U.S. where Conagra sources several key ingredients, eutrophication and algal blooms are an ongoing issue in water bodies such as Lake Erie and the Gulf of Mexico, with high impact to ecosystem health and drinking water quality. Eutrophication and algal blooms can drastically alter aquatic ecosystems and kill large populations of aquatic animals. The presence of cyanotoxins common in algal blooms can be fatal to humans upon exposure in situations where water is sourced for municipal drinking water or used for recreation.

**Management procedures**

Soil conservation practices  
Crop management practices  
Sustainable irrigation and drainage management  
Fertilizer management  
Pesticide management  
Waste water management  
Change raw material inputs  
Follow regulation standards

**Please explain**

Conagra Brands manages water-related impacts in the supply chain through monitoring compliance with our Supplier Code of Conduct and working with contracted growers to encourage implementation of sustainable agriculture practices. Compliance with Conagra Brands' Supplier Code of Conduct is required for all suppliers and includes a requirement to protect water resources through restorative or conservation efforts, act in an environmentally responsible manner, and comply with all applicable environmental standards. Compliance to the Code of Conduct is monitored continuously. Our responsible sourcing program encourages practices for our contracted growers that reduce the risk of fertilizer pollution in runoff, such as precise application of nutrients and conservation tillage. Success is measured through annual reporting on sustainability improvements and impacts as part of our Citizenship Report.

---

**Potential water pollutant**

Pesticides and other agrochemical products

**Activity/value chain stage**

Agriculture – supply chain

**Description of water pollutant and potential impacts**

Pesticides and agrochemical products can present water risks when chemicals are improperly applied or stored, accidental spills, or residual material leaches through the soil into groundwater or is carried via surface runoff to water bodies.

**Management procedures**

Soil conservation practices  
Crop management practices  
Sustainable irrigation and drainage management  
Fertilizer management  
Pesticide management  
Waste water management  
Change raw material inputs  
Follow regulation standards

**Please explain**

Conagra Brands manages water-related impacts in the supply chain through monitoring compliance with our Supplier Code of Conduct and working with contracted growers to encourage implementation of sustainable agriculture practices. Conagra Brands' Supplier Code of Conduct is required for all suppliers and includes an expectation for suppliers to act in an environmentally responsible manner, and at a minimum requires compliance with all applicable environmental standards. Compliance to the Code of Conduct is monitored continuously. Our responsible sourcing program encourages practices for our contracted growers that reduce the risk of fertilizer pollution in runoff, such as precise application of nutrients and conservation tillage. Success is measured through annual reporting on sustainability improvements and impacts as part of our Citizenship Report.

---

**Potential water pollutant**

Other, please specify (Materials used to operate manufacturing)

**Activity/value chain stage**

Manufacturing – direct operations

**Description of water pollutant and potential impacts**

In manufacturing, spillage of hazardous regulated chemicals into watersheds is possible, but rare. Most of our facilities discharge to water treatment plants, but some discharge regulatory-approved treated wastewater directly to land application or surface water. Potential impacts vary by location, but may include chemicals that may impact local aquatic life and persistent in the environment. We have audit procedures in place to minimize exposure and risk, and we monitor discharge for compliance.

**Management procedures**

Waste water management  
Follow regulation standards  
Other, please specify (Robust safety procedures)

**Please explain**

Our manufacturing facilities are required to maintain compliance with all regulatory standards, including wastewater quality and management of hazardous materials. All incoming materials are classified in our hazardous chemical database and are ranked for acute toxicity [mammalian, avian, aquatic, insects (beneficial)] including eco-toxicity and persistence in the environment. Safety procedures are in place to prevent spills and exposure to hazardous materials, and if an accident were to occur our facilities have a robust process to control and mitigate the event. Regulatory compliance is continuously monitored for all sites and where applicable, facilities track wastewater quality as required by discharge permits. Success is measured and evaluated by ensuring these regulatory standards are met and adverse effect to the

environment is minimized.

---

#### Potential water pollutant

Wastewater and sludge with high organic or suspended solids content

#### Activity/value chain stage

Manufacturing – direct operations

#### Description of water pollutant and potential impacts

Wastewater with high organic or solids content, if discharged to the environment without proper treatment, has the potential to contaminate water bodies and lead to eutrophication (oxygen depletion) of aquatic environments, harming natural ecosystems and water quality. Food processing and manufacturing can lead to wastewater with high organic loads that must be properly treated to minimize potential harm.

#### Management procedures

Waste water management  
Adapt processing or cooking methods  
Follow regulation standards

#### Please explain

Conagra Brands manages all facilities in compliance with local regulation for wastewater quality. For those facilities that discharge wastewater directly to surface water or via land application we have adequate pre-treatment and regular testing in place in accordance with applicable effluent permits. For example, our Oakdale facility uses pre-treatment lagoons that undergo both mechanical separation and biological treatment in order to reduce solids and organic load prior to the effluent being used as land irrigation. If direct discharge or land application is not used, facilities direct wastewater to the local municipal treatment plant. In addition, we have implemented best practices to preventatively reduce the organics loading of our wastewater. For example, our Russellville facility implemented a process to pre-clean equipment in advance of sanitation in order to remove solids before they enter the drain, lowering the organic content of the facility's wastewater. We measure success through monitoring wastewater quality parameters and reductions in BOD / TSS, in addition to continuous monitoring of compliance with our permitted effluent limits. We strive for zero NOVs and these are reported to the Board on an annual basis.

---

### W3.3

---

#### (W3.3) Does your organization undertake a water-related risk assessment?

Yes, water-related risks are assessed

### W3.3a

---

#### (W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

##### Direct operations

##### Coverage

Full

##### Risk assessment procedure

Water risks are assessed as a standalone issue

##### Frequency of assessment

Annually

##### How far into the future are risks considered?

More than 6 years

##### Type of tools and methods used

Tools on the market  
Databases  
Other

##### Tools and methods used

WRI Aqueduct  
Internal company methods  
National-specific tools or standards

##### Comment

Conagra Brands' response to W3.3d describes our process for identifying, assessing, and responding to water-related risks within our direct operations.

**Supply chain**

**Coverage**

Partial

**Risk assessment procedure**

Water risks are assessed as a standalone issue

**Frequency of assessment**

More than once a year

**How far into the future are risks considered?**

More than 6 years

**Type of tools and methods used**

Tools on the market

Databases

Other

**Tools and methods used**

WRI Aqueduct

Internal company methods

National-specific tools or standards

**Comment**

Conagra Brands' response to W3.3d describes our process for identifying, assessing, and responding to water-related risks within other stages of our value chain.

**Other stages of the value chain**

**Coverage**

Please select

**Risk assessment procedure**

<Not Applicable>

**Frequency of assessment**

<Not Applicable>

**How far into the future are risks considered?**

<Not Applicable>

**Type of tools and methods used**

<Not Applicable>

**Tools and methods used**

<Not Applicable>

**Comment**

**W3.3b**

---

**(W3.3b) Which of the following contextual issues are considered in your organization's water-related risk assessments?**

	Relevance & inclusion	Please explain
Water availability at a basin/catchment level	Relevant, always included	Our own facilities rely on access to clean water to operate, prepare food on a commercial scale and ensure that our equipment meets or exceeds food safety and quality standards. As a result, understanding the availability and quality of water at a local level is critical to day-to-day operations and included in Conagra Brands water risk assessment. These issues are integrated into the WRI Aqueduct tool assessment conducted on an annual basis by mapping each local manufacturing facility. Conagra Brands Sustainability team reviews the data and overlays production and current water withdrawal data along with internal company knowledge to identify and monitor water use at high risk sites, including our Russellville, AR facility where we produce frozen meals. Beyond our direct operations, water availability is critical to growing the agricultural ingredients we use in our products. These issues are also integrated into our assessment using the WRI Aqueduct tool and risk mapping of our supply chain.
Water quality at a basin/catchment level	Relevant, always included	Our own facilities rely on access to clean water to operate, prepare food on a commercial scale and ensure that our equipment meets or exceeds food safety and quality standards. As a result, understanding the availability and quality of water at a local level is critical to day-to-day operations and included in Conagra Brands water risk assessment. These issues are integrated into the WRI Aqueduct tool assessment conducted on an annual basis by mapping each local manufacturing facility. Conagra Brands Sustainability team reviews the data and overlays production and current water withdrawal data along with internal company knowledge to identify and monitor water use at high risk sites, our Russellville, AR facility where we produce frozen meals. Factories are also responsible to review the water quality report from the municipality from where they receive their water on an annual basis. Depending on the results, other actions may be taken to ensure water quality. Beyond our direct operations, water quality is critical to growing the agricultural ingredients we use in our products. These issues are also integrated into our assessment using the WRI Aqueduct tool and risk mapping of our supply chain.
Stakeholder conflicts concerning water resources at a basin/catchment level	Relevant, always included	In both our direct operations and supply chain, stakeholder conflicts concerning water resources have the potential to affect regulatory requirements and/or costs to access clean water. Beyond the quality and availability issues evaluated in our supply chain and operations water risk mapping using WRI Aqueduct, Conagra Brands factors in local water regulations and associated usage and discharge fees for significant water users across our portfolio and in markets where we have knowledge of proposed changes in water regulations and tariffs. Corporate EHS and Sustainability teams along with our manufacturing facilities monitor on-going issues, including regulatory issues due to drought.
Implications of water on your key commodities/raw materials	Relevant, always included	Continued water quality and availability are critical to sourcing the agricultural raw materials used in our products. Current implications of water for key raw materials are included in the scope of Conagra Brands sustainable agriculture programs for commodities where we have direct relationships with growers, such as the tomatoes used for our Hunts® canned tomato products. This is assessed based on internal company knowledge. Additionally, our Supplier Excellence Program collects information on water-related issues for our key suppliers of ingredients and packaging, including KPIs related to supplier transparency and disclosure of water risks and management activities.
Water-related regulatory frameworks	Relevant, always included	Regulatory frameworks are relevant to our direct operations, especially in areas that regularly experience drought such as our Oakdale, CA facility. Water-related regulation can present impacts such as use restrictions or increased cost related to water consumption in our operations. Conagra Brands factors in local water regulations and associated usage and discharge fees for significant water users across our portfolio and in markets where we have knowledge of proposed changes in water regulations and tariffs. Corporate EHS and sustainability teams along with our manufacturing facilities monitor on-going issues, including regulatory issues due to drought.
Status of ecosystems and habitats	Relevant, always included	Conagra Brands is committed to being a responsible corporate citizen, and considers ecosystem and habitat health in the regions where we operate to avoid negative effects from our manufacturing facilities. Conagra Brands factors in the current status of ecosystems and habitats at a local and macro-level based on outputs from tools such as WRI Aqueduct and WWF-DEG Water Risk assessment. As issues arise, they are discussed between the corporate EHS, sustainability, and project managers. If an issue is identified in our direct manufacturing footprint, the team evaluates solutions to avoid a negative impact on local ecosystems, such as the habitat of the Eastern Spadefoot Toad native to the area near our Milton, Pennsylvania facility.
Access to fully-functioning, safely managed WASH services for all employees	Relevant, always included	Access to fully-functioning WASH services for all employees is critical to our business and food safety & quality standards. This is assessed within the Aqueduct tool as well as based on internal knowledge of operating conditions within our manufacturing facilities. The Conagra Brands EHS teams ensure fully functioning WASH services for all workers in our health and safety inspections and certificates. Additionally, all Conagra Brands facilities regularly measure and monitor this metric during health and safety audits.
Other contextual issues, please specify	Not considered	

**W3.3c**

--

**(W3.3c) Which of the following stakeholders are considered in your organization's water-related risk assessments?**

	Relevance & inclusion	Please explain
Customers	Relevant, always included	Conagra Brands' customers include foodservice organizations and food retailers, some of whom have sustainable supplier requirements around climate change, water management or deforestation which are relevant to Conagra Brands' water risk assessments. Where standards and customer preferences exist, they are always included. For example, Conagra Brands has engaged in sustainable supplier summits and working groups covering water, climate and deforestation risks for a major QSR. In these forums, we have shared our best practices with other suppliers and explored strategies for meeting customer requests for continuous improvement.
Employees	Relevant, always included	Our employees are critical to implementing water conservation and safety procedures at our facilities. Conagra Brands addresses water risk at the employee level through training, which is available to all employees through our e-learning system. The courses on water and wastewater awareness help engage and test employee knowledge. Progress on training is reported to Environmental Managers and Environmental Platform Directors monthly. All employees are also able to submit water reduction projects to the yearly internal Sustainable Development Awards, which recognizes the top projects focused on reducing water and improving wastewater quality.
Investors	Relevant, always included	Conagra Brands actively manages investor relations and public affairs issues, including sustainability and water-related risks, as relevant to our investors. We publicly report on water-related issues including withdrawals, discharges, water risks, and risk management strategies in our Citizenship Report updated in the fourth quarter of each calendar year. Additionally, by responding to CDP since 2010, Conagra Brands provides investors with important information on water risk. This information is distributed from Senior Leadership on an annual basis to investors and is also publicly available on our the Conagra Brands website. We also respond to individual investor inquiries around water when they arise.
Local communities	Relevant, always included	Conagra Brands is committed to being a responsible corporate citizen and considers our impact on local communities in the regions where we operate. Our citizenship management strategy, as outlined in our annual Citizenship Report, includes a Stronger Communities strategic pillar. Conagra Brands engages with local communities on water risk by providing grants to environmentally focused non-profit organizations through our internal Sustainable Development Awards program. For example, in 2019, our Kent, Washington facility donated \$5,000 of Conagra Brands Foundation funds to the Duwamish River Cleanup Coalition to improve local water quality.
NGOs	Relevant, sometimes included	There is an active presence of NGOs concerned about water use issues in all locations where Conagra Brands operates facilities and/or sources ingredients, either directly or as part of a national or global organization with interests in the locality. Conagra Brands engages with NGOs on water risk through water-related dialogues such WWF's AgWater Challenge, and by providing grants to environmentally focused non-profit organizations through our internal Sustainable Development Awards program. For example, in 2019, Conagra Brands' Newport, Tenn. facility donated \$5,000 of Conagra Brands Foundation funds to the NGO organization Clean Water Expected in East Tennessee to help maintain river health in the area.
Other water users at a basin/catchment level	Relevant, always included	Local water risk for other water users is addressed for our manufacturing facilities and during evaluations of expanding operations. More than two-thirds of our water withdrawals come from public supply and more than 80% of discharges are directed to a publicly owned treatment facility, so where relevant our water-related permitting and facility requirements consider the impacts to other water users locally. Additionally, we engage with other water users at a local level by providing grants through our Sustainable Development Awards program. For example, Conagra Brands' Russellville, Ark. facility donated \$5,000 of Conagra Brands Foundation funds to the Arkansas Parks and Recreation Foundation to support Lake State Park.
Regulators	Relevant, always included	Conagra Brands considers the impacts that regulators have on our water risk assessment including operational impacts based on physical and regulatory risks. Regulators and regulations, especially those related to wastewater, are an important consideration both in terms of compliance and to increase our wastewater quality. Our teams engage directly with regulators and municipalities where relevant. For example, our corporate EHS and sustainability team met with the Milton Regional Sewer Authority in Milton, Pennsylvania, where our Chef Boyardee® pasta products are made, to help optimize the plant's wastewater treatment efficiency.
River basin management authorities	Relevant, sometimes included	Though we do not have a history of direct engagement with river basin management authorities, there are instances where Conagra Brands regional engagement and sustainability efforts align with and support river basin management authority plans and objectives. We source our tomatoes from California, where more than 95 percent of the U.S. and nearly one-third of the world's processed tomatoes are grown. The hydrology of California's agricultural areas – including where we grow and process tomatoes for Hunt's® branded products - is linked through river and groundwater systems that impact the San Joaquin River Basin. Conagra Brands approach to sustainable agriculture addresses water risk in the San Joaquin River basin on a voluntary basis, and through these efforts we indirectly support river basin management efforts led by authorities such as the Eastern San Joaquin County Groundwater Basin Authority, outside of formal engagement with these authorities.
Statutory special interest groups at a local level	Relevant, always included	Special interest groups include agencies concerned about water use issues who are active in locations where Conagra Brands operates facilities and/or sources ingredients. Conagra Brands water risk assessment has considered operational impacts based on physical and regulatory risks. As dictated by policy, factory personnel involve corporate resources if and when local special interest groups are involved.
Suppliers	Relevant, always included	With agriculture accounting for approximately 80 to 90 percent of U.S. consumptive water use, our suppliers and contracted growers depend on the availability of clean water to grow crops and produce the ingredients needed for making our food. Conagra Brands' engages on water-related risks with suppliers where we have direct relationships with farmers through our Sustainable Agriculture program, such as growers of tomatoes utilized in our Hunts® canned tomato products. For tomatoes, we annually track the percentage of growers that utilize drip irrigation. Additionally, Conagra Brands engages with key commodity suppliers through our Supplier Excellence Program, which includes approximately 60 suppliers covering approximately 75 percent of company spend on ingredients and packaging. The scorecard includes qualitative and quantitative sustainability measures including transparency, performance, and disclosure on risks related to climate, water, and deforestation.
Water utilities at a local level	Relevant, always included	More than two-thirds of our water withdrawals come from public supply and more than 80% of discharges are directed to a publicly owned treatment facility, so Conagra Brands always evaluates impact to water utilities whenever we evaluate capital projects to change manufacturing levels at our factories. We involve personnel from the utilities in discussions prior to executing projects that may impact their operations.
Other stakeholder, please specify	Not considered	

**W3.3d**

**(W3.3d) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.**

The primary tools leveraged by Conagra Brands to identify, assess and respond to water-related risks include: 1) WRI Aqueduct Water Risk Atlas – Food & Beverage weighting scheme; 2) in-house risk-mapping; 3) a Supplier Excellence Program sustainability assessment; and 4) international media resources.

Conagra Brands' sustainability team annually reviews the Aqueduct Water Risk data for our manufacturing locations, overlaying production and water withdrawal data with internal company knowledge to identify and monitor water use at high-risk sites. If a facility is designated as high-risk based on this assessment, water conservation efforts are prioritized at that location, in addition to other business drivers of decision-making.

Conagra Brands also employs a real-time risk mapping tool, wherein each of our US supplier locations is electronically mapped and cross-referenced with the latest published US government data on drought conditions (National Drought Mitigation Center) and global extreme weather events (NOAA & WMO). Our risk management team annually analyzes each supplier location in the database and communicates threats to our R&D and procurement teams. These teams use the risk intelligence information to inform their product design and manufacturing decisions. Our risk management team also uses our mapping tool to track real-time data on weather-related transportation disruptions that might impact our business. In fiscal year 2019, this tool helped us track and assess transportation impacts of extreme water-related weather events such as midwestern US flooding and hurricanes. Threats are communicated to internal stakeholders to drive decisions.

Conagra Brands' Supplier Excellence Program broadly measures the performance of our largest and most strategic suppliers on a diverse set of criteria, including social and environmental metrics. Water-related questions included in our Supplier Excellence Program assessment include whether suppliers respond publicly to the CDP Water Security Questionnaire, have water reduction goals, or implement sustainability policies that address agriculture or other value chain water use. The scoring system allows us to quantitatively measure supplier progress over time, and Conagra Brands uses this information to enhance business partnerships.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes, both in direct operations and the rest of our value chain

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

Water-related risks are particularly relevant to the food industry, with a global supply chain intensely dependent on the availability of clean water to grow ingredients. Managing water risk — both at our own facilities and those embedded in our supply chain — is critical to Conagra Brands' long-term business success.

To determine whether these water-related risks have potential to generate a substantive change in our business operations, revenue or expenditures, Conagra Brands' Enterprise Risk Management team assesses quantitative and qualitative impacts. The risk analysis factors in both the probability of the risk and estimated financial implications. For this purpose, substantive impacts are defined as changes with the potential to prevent Conagra Brands from achieving its strategic objectives. Examples of substantive risks include impacts that could threaten any of our brands through production shut-down or inability to obtain raw materials for our products. For example, our Hunt's® tomato products rely on tomatoes sourced from California, where drought is a persistent risk. As disclosed on a quarterly earnings call, this brand generates approximately \$450MM of our annual earnings. If water scarcity were to prevent access to tomatoes or compromise the ability of our processing plant to operate this would present a substantive financial impact on Conagra Brands' business. For financial reporting purposes, Conagra Brands applies the US Securities Exchange Commission materiality principles, where substantive impacts are defined as those that affect more than 5% of our revenue or assets, either in our direct operations or supply chain.

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	2	1-25	Water is used in many vital components of Conagra Brands' production. Water scarcity or pollution in the regions of any of our facilities can result in significant losses of revenue. Locations with an overall rating of 'medium to high', 'high', or 'extremely high' by the WRI Aqueduct tool are screened to see if they meet our substantive threshold and considered a risk to our business. Our direct water use risk assessment covers all of our facilities. The assessment includes water quality and availability at regional and water basin levels, stakeholder conflicts, regulations, ecosystem health indicators, and access to sanitation. Note that "facility" has been defined as any of our company locations involved in the production of goods or handling of products that is under the ownership of Conagra Brands. In 2019, 2 facilities were identified as high risk through the WRI Aqueduct screening: Irapuato, MX, and Oakdale, CA. These facilities represent about 4% of company-wide facilities and 15% of total water use.

W4.1c



(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?

Country/Area & River basin

United States of America	Sacramento River - San Joaquin River
--------------------------	--------------------------------------

Number of facilities exposed to water risk

1

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

1-10

Comment

Our Oakdale, CA facility was determined to be at high risk through the WRI Aqueduct Water Risk Assessment, with extremely high physical risk (water quantity).

Country/Area & River basin

Mexico	Santiago
--------	----------

Number of facilities exposed to water risk

1

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

1-10

Comment

Our Irapuato, MX facility was determined to be at high risk through the WRI Aqueduct Water Risk Assessment, with extremely high physical risk (water quantity).

W4.2

(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Mexico	Santiago
--------	----------

Type of risk & Primary risk driver

Physical	Increased water stress
----------	------------------------

Primary potential impact

Constraint to growth

Company-specific description

The Santiago River regularly faces water scarcity challenges. The potential for future drought is a risk factor in the availability of water for use in our processing facility in this region, which depends on a consistent water supply to produce products.

Timeframe

1-3 years

Magnitude of potential impact

Medium

Likelihood

Unlikely

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure - minimum (currency)**

<Not Applicable>

**Potential financial impact figure - maximum (currency)**

<Not Applicable>

**Explanation of financial impact**

Financial contribution of the ACT II and Hunt's brands produced at this facility can have a substantial impact on our business if we are unable to produce our products.

**Primary response to risk**

Adopt water efficiency, water reuse, recycling and conservation practices

**Description of response**

As part of Conagra Brands' site-specific sustainability targets including reducing water use per pound of production, our manufacturing facility reduced water consumption by 3% over the past year .

**Cost of response**

30000

**Explanation of cost of response**

The cost of response includes the investments in process, improved monitoring, and equipment upgrades made at this facility in order to implement water conservation projects.

---

**Country/Area & River basin**

United States of America	Sacramento River - San Joaquin River
--------------------------	--------------------------------------

**Type of risk & Primary risk driver**

Physical	Drought
----------	---------

**Primary potential impact**

Reduction or disruption in production capacity

**Company-specific description**

The Sacramento River is in California's central valley which regularly faces water scarcity challenges. The potential for future drought will continue to affect the availability and cost of water for use in our tomato processing facility located in this region, which depends on a consistent water supply to operate.

**Timeframe**

1-3 years

**Magnitude of potential impact**

High

**Likelihood**

Unlikely

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure - minimum (currency)**

<Not Applicable>

**Potential financial impact figure - maximum (currency)**

<Not Applicable>

**Explanation of financial impact**

Financial contribution of the Hunt's brand at this facility that can have a substantial impact on our business if we are unable to produce our products.

**Primary response to risk**

Establish site-specific targets

**Description of response**

Beginning in FY12, Conagra Brands set site specific sustainability targets including reducing water use per pound of production. Our tomato facility has completed multiple projects to conserve water, all with very low implementation costs amounting to less than \$100,000. Projects implemented include installing water meters, recirculating water used to cool equipment and installing a holding tank to maximize the use of reclaimed water from tomatoes.

**Cost of response**

100000

**Explanation of cost of response**

The cost of response includes the investments in process or equipment upgrades made at this facility in order to implement water conservation projects. Projects implemented include installing more water meters, recirculating water used to cool equipment and installing a holding tank to maximize the use of reclaimed water from tomatoes.

#### Country/Area & River basin

United States of America	Sacramento River - San Joaquin River
--------------------------	--------------------------------------

#### Type of risk & Primary risk driver

Regulatory	Higher water prices
------------	---------------------

#### Primary potential impact

Increased operating costs

#### Company-specific description

The Sacramento River is in California's central valley which regularly faces water scarcity challenges. The potential for future drought will continue to impact water policy, and in turn, water prices for our tomato facility located in the Sacramento River – San Joaquin River basin. Communities experiencing high levels of water stress typically consider higher water pricing to encourage conservation. Higher water pricing for our tomato facility could materially impact operating costs and production.

#### Timeframe

1-3 years

#### Magnitude of potential impact

Low

#### Likelihood

Very likely

#### Are you able to provide a potential financial impact figure?

No, we do not have this figure

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure - minimum (currency)

<Not Applicable>

#### Potential financial impact figure - maximum (currency)

<Not Applicable>

#### Explanation of financial impact

Financial contribution of the Hunt's brand produced at this facility that can have a substantial impact on our business if we are unable to produce our products.

#### Primary response to risk

Establish site-specific targets

#### Description of response

Beginning in FY12, Conagra Brands set site specific sustainability targets including reducing water use per pound of production. Our tomato facility has completed multiple projects to conserve water, all with very low implementation costs amounting to less than \$100,000. Projects implemented include installing water meters, recirculating water used to cool equipment and installing a holding tank to maximize the use of reclaimed water from tomatoes.

#### Cost of response

100000

#### Explanation of cost of response

The cost of response includes the investments in process or equipment upgrades made at this facility in order to implement water conservation projects. Projects implemented include installing more water meters, recirculating water used to cool equipment and installing a holding tank to maximize the use of reclaimed water from tomatoes

#### W4.2a

(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

United States of America	Sacramento River - San Joaquin River
--------------------------	--------------------------------------

Stage of value chain

Supply chain

Type of risk & Primary risk driver

Physical	Increased water stress
----------	------------------------

Primary potential impact

Supply chain disruption

Company-specific description

The potential for drought in California's Central Valley not only affects our direct tomato manufacturing operations but also impacts tomato growers within the Sacramento - San Joaquin river basin where the tomatoes for our Hunts® products are grown.

Timeframe

Current up to one year

Magnitude of potential impact

Unknown

Likelihood

Very likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact

Financial contribution of one of the brands at this facility that can have a substantial impact on our business if we are unable to obtain materials for our products.

Primary response to risk

Supplier engagement	Work with supplier to engage with local communities
---------------------	---

Description of response

Currently Conagra Brands manages the potential impact of the drought in California by contracting with growers with well access on their grounds or farm in the Delta and have water rights. By doing so, we are able to work with growers that will have the ability to irrigate their fields to better control the outcome of the crop. Additionally, Conagra Brands has contingency plans in place to obtain tomato paste from alternate suppliers to ensure other facilities are not impacted by the drought if unable to receive tomato paste from our facility in California.

Cost of response

5000

Explanation of cost of response

Working with our growers and developing alternative sourcing plans is integrated into our normal staff responsibilities and incurred no additional cost. The cost of our response strategy was donating a \$5,000 grant from a winning Sustainable Development Award project to UC Davis to help fund drought research.

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes, we have identified opportunities, and some/all are being realized

W4.3a

(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.

**Type of opportunity**

Efficiency

**Primary water-related opportunity**

Cost savings

**Company-specific description & strategy to realize opportunity**

Water use is a critical input to our business, and reducing consumption in our facilities presents meaningful savings opportunities. Conagra Brands 2020 Sustainability Vision includes a goal to reduce water use by 20% per pound of product produced. The water reduction goal has provided incentive to implement water projects to more efficiently use water while driving cost out of our operations. To help us realize this opportunity, the Sustainability team hosts the annual Sustainable Development Awards to recognize our top sustainability achievements and reward facility teams that implement water conservation projects. One of four categories included annually in Conagra Brands internal Sustainable Development Awards is Water Conservation and Wastewater Management. In FY2019 27 water-related projects were implemented, resulting in reduced cost and over 120 million gallons of water conserved. For example, the winning project at the Imlay City, MI plant reduced annual water use nearly 30% by installing a new closed loop water chiller system, saving 48 million gallons of water per year.

**Estimated timeframe for realization**

Current - up to 1 year

**Magnitude of potential financial impact**

Low

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

14000000

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact**

The financial impact figure is cumulative annual cost savings from water-related Sustainable Development Awards projects. Water conservation projects have proven to result in significant cost savings for our facilities. The FY2019 water projects recognized by our Sustainable Development Awards program resulted in annual cost savings of more than \$14,000,000 due to reduced municipal water use and discharge fees. Although the value of implemented projects varies each year, this figure represents the potential savings that facilities may see based on historical data.

## W5. Facility-level water accounting

### W5.1

(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.

**Facility reference number**

Facility 1

**Facility name (optional)**

Irapuato

**Country/Area & River basin**

Mexico	Santiago
--------	----------

**Latitude**

20.69289

**Longitude**

-101.34183

**Located in area with water stress**

Yes

**Primary power generation source for your electricity generation at this facility**

<Not Applicable>

**Oil & gas sector business division**

<Not Applicable>

**Total water withdrawals at this facility (megaliters/year)**

393

**Comparison of total withdrawals with previous reporting year**

About the same

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

393

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

0

**Total water discharges at this facility (megaliters/year)**

295

**Comparison of total discharges with previous reporting year**

Lower

**Discharges to fresh surface water**

290.4

**Discharges to brackish surface water/seawater**

0

**Discharges to groundwater**

4.4

**Discharges to third party destinations**

0

**Total water consumption at this facility (megaliters/year)**

98

**Comparison of total consumption with previous reporting year**

Much higher

**Please explain**

Our Irapuato, MX facility sources from groundwater and discharges via direct discharge and land irrigation in accordance with all applicable permits. Both withdrawals and discharge are measured onsite. Consumption is estimated based on withdrawals less discharge. Total withdrawals decreased slightly (~1%) over FY18, and total discharge decreased by nearly 40% due to the investments in process, improved monitoring, and equipment upgrades made at this facility in order to implement water conservation projects. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.

**Facility reference number**

Facility 2

**Facility name (optional)**

Oakdale

**Country/Area & River basin**

United States of America	Sacramento River - San Joaquin River
--------------------------	--------------------------------------

**Latitude**

37.7601

**Longitude**

-120.84301

**Located in area with water stress**

Yes

**Primary power generation source for your electricity generation at this facility**

<Not Applicable>

**Oil & gas sector business division**

<Not Applicable>

**Total water withdrawals at this facility (megaliters/year)**

2348

**Comparison of total withdrawals with previous reporting year**

About the same

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

105.3

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

2242.5

**Total water discharges at this facility (megaliters/year)**

2704

**Comparison of total discharges with previous reporting year**

Lower

**Discharges to fresh surface water**

1656

**Discharges to brackish surface water/seawater**

0

**Discharges to groundwater**

1048

**Discharges to third party destinations**

0

**Total water consumption at this facility (megaliters/year)**

356

**Comparison of total consumption with previous reporting year**

Lower

**Please explain**

Our Oakdale, CA facility sources from groundwater and municipal sources and discharges via direct discharge and land irrigation in accordance with all applicable permits. Both withdrawals and discharge are measured onsite. Consumption is estimated based on withdrawals less discharge. Total withdrawals decreased slightly (~1%) over FY18, and total discharge decreased by roughly 8% due to efficiency measures at the facility. In 2019, the facility implemented a condensate return project that will conserve an additional 21 million gallons of water annually. Thresholds used include: change of <-51%: Much lower; -6% to -50%: Lower; -5% to +5%: About the same; +6% to +50%: Higher; >+50%: Much higher.

---

**W5.1a**

---

(W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been externally verified?

**Water withdrawals – total volumes**

**% verified**  
76-100

**What standard and methodology was used?**

Conagra Brands water withdrawal data is annually verified in accordance with International Standard Assurance Engagements (ISAE) 3000 to limited assurance standards.

**Water withdrawals – volume by source**

**% verified**  
76-100

**What standard and methodology was used?**

Conagra Brands water withdrawal data is annually verified in accordance with International Standard Assurance Engagements (ISAE) 3000 to limited assurance standards.

**Water withdrawals – quality**

**% verified**  
76-100

**What standard and methodology was used?**

We have a policy detailing specific elements of water quality checks in varying frequency depending upon water type. Testing frequencies range from weekly to annually.

**Water discharges – total volumes**

**% verified**  
Not verified

**What standard and methodology was used?**

<Not Applicable>

**Water discharges – volume by destination**

**% verified**  
Not verified

**What standard and methodology was used?**

<Not Applicable>

**Water discharges – volume by treatment method**

**% verified**  
Not verified

**What standard and methodology was used?**

<Not Applicable>

**Water discharge quality – quality by standard effluent parameters**

**% verified**  
Not verified

**What standard and methodology was used?**

<Not Applicable>

**Water discharge quality – temperature**

**% verified**  
Not verified

**What standard and methodology was used?**

<Not Applicable>

**Water consumption – total volume**

**% verified**  
Not verified

**What standard and methodology was used?**

<Not Applicable>

**Water recycled/reused**

**% verified**  
Not verified

**What standard and methodology was used?**

<Not Applicable>

---

**W6. Governance**

---

**W6.1**

---



(W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Description of business dependency on water Description of business impact on water Description of water-related performance standards for direct operations Description of water-related standards for procurement Company water targets and goals Commitments beyond regulatory compliance Commitment to stakeholder awareness and education Acknowledgement of the human right to water and sanitation Other, please specify (Incorporated within group EHS policy)	Recognizing the increasing global risks related to water quality and availability, Conagra Brands has implemented a company-wide water stewardship policy for all locations under operational control of Conagra Brands. The policy reflects our commitment to be a responsible corporate citizen and build a culture of sustainability, including reducing water use and improving wastewater discharge quality in our operations. The policy states that all facilities shall implement our water resources management program, supporting water measurement, conservation, wastewater management, and reporting activities. This includes commitments to: maintain a complete and accurate inventory of all direct water use in our facilities in alignment with GRI standards; monitor water-related risks and opportunities (including physical, regulatory, and operational), using tools such as the WRI Aqueduct; maintain and publicly communicate a water use reduction goal, including our legacy Conagra Brands target of 20% water intensity reduction by 2020; implement strategies to reduce water use and ensure wastewater discharge quality at our facilities; facilitate best-practice sharing of water efficiency and conservation strategies; routinely report progress internally and externally; and support stakeholder requests related to water use and risk. Our water policy is attached (section W11) and therefore publicly available. Our targets, goals, and commitment to stakeholder awareness can be found in our Citizenship Report online. While not included in our water policy, access to fully functioning WASH services for all workers is included in health & safety inspections and certificates, and all our facilities regularly measure and monitor this metric during health & safety audits.

W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual	Please explain
Board-level committee	Conagra Brands' materiality assessment noted water as one of the material issues to be managed as part of our CSR and sustainability governance. Our Board of Directors maintains a Nominating and Corporate Governance Committee that meets at least three times a year. All members are independent directors and are appointed by the Board. The responsibilities of the Committee include: 1) reviewing and recommending to the Board corporate governance principles and guidelines for Conagra Brands; 2) reviewing Conagra Brands' policies and programs related to corporate citizenship, social responsibility and public policy issues significant to the company, such as sustainability and environmental responsibility; and 3) advising management on internal and external factors affecting Conagra Brands' image and reputation, including those related to corporate citizenship and sustainability. The Chair of the Committee reports to the full Board following every scheduled meeting of the Committee.

W6.2b

(W6.2b) Provide further details on the board's oversight of water-related issues.

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Overseeing acquisitions and divestiture Overseeing major capital expenditures Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Setting performance objectives Other, please specify (See explanation)	The Nominating and Corporate Governance Committee regularly meets with management to review internal and external factors and relationships affecting the company's reputation, including social and environmental issues. All members of the Committee are independent Board members. The Chair of the Committee reports to the full Board on its activities. The Board addresses the following items in its capacity as a governing body, all of which influence Conagra Brands' CSR directly or indirectly: reviewing and guiding strategy; reviewing and guiding plans of action; reviewing and guiding risk management policies; reviewing and guiding annual budgets; reviewing and guiding business plans; setting performance objectives; monitoring implementation and performance objectives; overseeing major capital expenditures/acquisitions/divestitures; monitoring and overseeing corporate sustainability strategy (including climate change, water and deforestation topics) and related progress against public goals; reviewing innovation strategy; and approving some employee incentives. During Board meetings, board members are able to provide feedback and comments on these governance mechanisms and their relationship to managing CSR/sustainability, and climate change, water and deforestation risks as a subset of that where relevant.

W6.3

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)

Chief Operating Officer (COO)

Responsibility

Both assessing and managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

Annually

Please explain

Together with the Chief Communications Officer and the Chief Human Resources Officer, the Chief Supply Chain Officer [Chief Operating Officer (COO) equivalent in CDP response designations] is the executive sponsor of Corporate Social Responsibility (CSR) work within the company and report directly to the CEO. As an executive sponsor, the Chief Supply Chain Officer [Chief Operating Officer (COO) equivalent in CDP response designations] serves as a champion for sustainability issues and resources needed, guides and approves sustainability strategy including water-related decisions, and facilitates updates to the Board and other leaders on water and sustainability issues. Updates to the Board on water-related issues are currently on an annual basis tied to annual citizenship report content, and generally provided in person by an executive sponsor of CSR work or other designated representative. Frequency may change as needed based on pressing Board topics.

W6.4

(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

	Provide incentives for management of water-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

Yes, direct engagement with policy makers

Yes, trade associations

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

To ensure that Conagra Brands direct and indirect activities that influence policy are consistent with our overall water strategy, the same individuals with sustainability oversight coordinate with government and regulatory affairs staff, actively participate in policy organizations, and participate in quarterly meetings with business leaders across the company who play a role in Conagra Brands' policy advocacy on a variety of fronts. This continuity ensures consistent messaging and provides line-of-sight to potential synergies across these organizations. For example, we ensure that environmental non-profits we engage with on water topics, such as WWF, have policies and positions that are consistent with ours on water use. We choose to participate in meetings based on that alignment criteria, such as an in-person Water Challenge strategy session.

W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

Yes (you may attach the report - this is optional)  
CAG Annual Report 2020.PDF

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	16-20	The availability of clean water is essential to how we prepare food and critical to the farmers that grow our raw ingredients, which makes water-related issues such as quality, availability, cost, and consumption of water in our direct operations and supply chain important components of our long-term business objectives. For example, Conagra Brands considers water when making significant manufacturing facility investments, since manufacturing facilities may operate in the same location for decades. For example, our Menomonie, Wisc. Swiss Miss plant was originally founded in 1917 as the John Wildi Evaporated Milk Company in 1917, and sold to ConAgra Foods in 1990. It has been operating as a Conagra manufacturing facility since 1990, and water is critical to ongoing production.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	16-20	The availability of clean water is essential to how we prepare food and critical to the farmers that grow our raw ingredients. The sustainable ingredient priority plans within our R&D organization consider water stress in the regions we source ingredients from, based on the WRI Aqueduct 2040 water stress map.
Financial planning	Yes, water-related issues are integrated	16-20	Expanding our long-term manufacturing facilities to produce more product are significant financial planning efforts that consider water issues related to operations. Conagra has been manufacturing Slim Jim meat snack products at our Troy, Ohio facility since 2010, and in Dec 2020, we plan to complete a \$100MM expansion of that facility to add 63,000 square feet of production area, equipment for new packaging capabilities to enable new product formats, new smokehouses and drying rooms, and the related water supply and treatment infrastructure needed.

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)  
0

Anticipated forward trend for CAPEX (+/- % change)  
0

Water-related OPEX (+/- % change)  
0

Anticipated forward trend for OPEX (+/- % change)  
0

Please explain  
There has been no substantial change in this report period for our water-related capital expenditure and operating expenditure.

W7.3

(W7.3) Does your organization use climate-related scenario analysis to inform its business strategy?

	Use of climate-related scenario analysis	Comment
Row 1	Yes	

W7.3a

(W7.3a) Has your organization identified any water-related outcomes from your climate-related scenario analysis?

Yes

W7.3b

(W7.3b) What water-related outcomes were identified from the use of climate-related scenario analysis, and what was your organization's response?

	Climate-related scenarios and models applied	Description of possible water-related outcomes	Company response to possible water-related outcomes
Row 1	Other, please specify (WRI Aqueduct Tool and in-house tools)	Conagra Brands uses the WRI Aqueduct tool, along with a supplemental in-house scenario analysis (focused on high-risk regions) to identify long-term water-related outcomes associated with future climate scenarios through 2040. Possible outcomes include: Certain regions in our supply chain that are more severely impacted by climate change will experience greater water scarcity; and policy-based water restrictions due to drought and water availability have the potential to increase cost and/or reduce access to water for our direct operations in water stressed regions.	In the short and medium term, we continue to identify and implement projects to reduce water use in our operations specifically in drought-prone areas such as California. To address possible long-term water scarcity in the supply chain, we have identified and maintain an internal Sustainably Advantaged Ingredients list, which includes crops with climate change adaptation characteristics such as drought resilience. We have also identified that plant-based proteins have better adaptation potential than animal-based proteins which aligns with Conagra's ongoing strategy to increase plant-based offerings in our products.

W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, but we are currently exploring water valuation practices

Please explain

We do not currently use an internal price on water but are exploring options to value water sustainability, such as through consideration of water savings as part of capital project approvals.

W8. Targets

W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

	Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
Row 1	Company-wide targets and goals Business level specific targets and/or goals Site/facility specific targets and/or goals	Targets are monitored at the corporate level Goals are monitored at the corporate level	Guided by our refreshed materiality assessment, the sustainability cross-functional team reviews Conagra Brands overall sustainability strategy, target/goal setting, programming and reporting priorities at a company level. Our approach to setting targets/goals is based on industry research, a comparison to peers and current water usage. Conagra Brands set a 2020 intensity-based water reduction target to reduce water use per unit of production by 20%. Beginning in FY12, Conagra Brands set site specific water use intensity reduction targets. That year we begin to measure and track water use per pound of production. For each of our manufacturing facilities, we track direct water use on a monthly basis, charting progress towards site-specific, year-over-year reduction goals that are set as part of the annual planning process. Having a very diverse product portfolio, there's a wide range of water used to prepare different foods. Therefore, our facilities water use reduction goals vary based on opportunity. For example, some of the foods we make — such as peanut butter— require very little process water. Others are much more water intensive, either in actual food preparation or sanitation requirements. This kind of insight allows us to make strategic decisions about where and how we focus our resources. The progress is monitored and communicated monthly to internal stakeholders by the corporate sustainability team in our Supply Chain organization. We report progress towards annual water use reduction goals to our operations leadership team as part of the period review, along with other sustainability metrics. Progress towards these goals is included in operations leadership and plant management performance appraisals

W8.1a

**(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.**

**Target reference number**

Target 1

**Category of target**

Water withdrawals

**Level**

Company-wide

**Primary motivation**

Water stewardship

**Description of target**

Our 2020 Sustainability Vision outlines measurable objectives, including the elimination of all forms of waste and ensuring long-term access to the resources required to make our products. To maximize water use efficiency while emphasizing sustainable water management practices, Conagra Brands has set an intensity-based target to reduce water use per pound of production by 20 percent by 2020. In FY08, the water use intensity was 0.7, reported as gallons of water used per pound production. To reach our 2020 Sustainability vision requires Conagra Brands to have a water intensity of 0.55.

**Quantitative metric**

% reduction per unit of production

**Baseline year**

2008

**Start year**

2008

**Target year**

2020

**% of target achieved**

33

**Please explain**

In FY19, Conagra Brands water intensity was 0.65 gallons per pound of product, equating to a 7% reduction in water intensity. As of FY19 Conagra Brands has achieved 33% of the 2020 target.

**W8.1b**

**(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.**

**Goal**

Other, please specify (Water risk management)

**Level**

Company-wide

**Motivation**

Risk mitigation

**Description of goal**

Conagra Brands' 2020 Sustainability vision includes a goal to actively address water risk at the corporate level. Continued water quality and availability is critical to our continued operations and sourcing of ingredients, and understanding and monitoring regional water risks at the corporate level allows us to plan for and ensure continued water security for our business. We have implemented this goal through addressing water risk in both our facilities and our ingredient supply chain. For our facilities, Conagra Brands set site specific water use intensity reduction targets beginning in 2012 and has implemented a number of water use reduction projects. The water risk level at each facility is assessed annually using the WRI Aqueduct risk mapping tool, which enables prioritization and planning of efficiency projects. Conagra Brands also employs a custom in-house risk mapping tool that monitors extreme weather and drought conditions impacting our supply chain. Our risk management team analyzes each supplier location annually and communicates threats to our R&D and procurement teams to influence product design and manufacturing decisions. The risk management team also tracks weather-related transportation disruptions that impact our business in real time, and this tool helped us track and assess transportation impacts of hurricanes Irma, Harvey and Michael in the US Southeast.

**Baseline year**

2016

**Start year**

2016

**End year**

2020

**Progress**

For each of our manufacturing facilities, we track direct water use monthly, charting progress towards site-specific, year-over-year reduction goals that are set as part of the annual planning process. Indicators used to assess progress of our in-house risk mapping tool include the successful use of the tool in real-time to track water-related disruptions and take necessary action. Progress towards our corporate water goal is included in operations leadership, plant management and other key individuals' performance appraisals.

**W9. Verification**

W9.1

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?

Yes

W9.1a

(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	Water withdrawal volume	ISAE 3000	Conagra Brands water withdrawal data is annually verified for all Conagra Brands locations, in accordance with International Standard Assurance Engagements (ISAE) 3000 to limited assurance standards. This verification is inclusive of facilities not covered in 5.1d (high-risk).
W8 Targets	Volume of water used per pound of food product produced	ISAE 3000	Our water intensity metric is verified to ensure accurate reporting on progress towards our 2020 water intensity reduction target.

W10. Sign off

W-FI

(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

060117WaterStewardship Policy.pdf

W10.1

(W10.1) Provide details for the person that has signed off (approved) your CDP water response.

	Job title	Corresponding job category
Row 1	Executive Vice President & Chief Supply Chain Officer	Chief Operating Officer (COO)

W10.2

(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

Yes

SW. Supply chain module

SW0.1

(SW0.1) What is your organization's annual revenue for the reporting period?

	Annual revenue
Row 1	9540000000

SW0.2

(SW0.2) Do you have an ISIN for your organization that you are willing to share with CDP?

No

SW1.1

(SW1.1) Could any of your facilities reported in W5.1 have an impact on a requesting CDP supply chain member?

This is confidential

## SW1.2

(SW1.2) Are you able to provide geolocation data for your facilities?

	Are you able to provide geolocation data for your facilities?	Comment
Row 1	Yes, for all facilities	

## SW1.2a

(SW1.2a) Please provide all available geolocation data for your facilities.

Identifier	Latitude	Longitude	Comment
Archbold	41.52144	-84.307172	
Boisbriand	45.612634	-73.838373	
Brookston	40.602814	-86.867234	
Council Bluffs	41.261944	-95.860833	
Dickson	36.077005	-87.38779	
Dresden	42.589561	-82.183314	
Hamburg	40.604446	-95.657771	
Humboldt	35.819792	-88.915895	
Indianapolis Bakery	39.86947	-86.234079	
Indianapolis	20.678665	-101.354496	
Kent	47.380933	-122.234843	
Lakeview	42.31165	-95.053324	
Lincoln	40.813616	-96.702596	
Louisville	38.218491	-85.75812	
Macomb	42.70247	-82.95793	
Macon MO	39.742256	-92.472686	
Mankato	44.15932	-93.9953	Approximate location
Maple Grove	45.072464	-93.455788	
Marshall	39.123078	-93.19687	
Mattoon	-39.46951	-88.3636	Approximate location
Menomonie	44.875518	-91.919342	
Milton	41.01203	-76.847741	
Milwaukee	43.05278	-87.96469	Approximate location
Newport	35.967041	-83.187658	
Oakdale	37.766595	-120.847154	
Omaha 6 CAG Dr	41.256537	-95.934503	
Omaha 9 CAG Dr	41.256537	-95.934503	
Quincy	41.944215	-84.883852	
Reno	39.51776	-119.81977	Approximate location
Rensselaer	40.936704	-87.150856	
Russellville	35.278417	-93.133786	
Streator	41.120867	-88.835352	
Sylvester	31.530735	-83.835454	
Troy	40.039498	-84.203277	
Waterloo	42.492786	-92.342578	
Omaha 11 CAG Dr	41.256537	-95.934503	
Chicago	41.890013	-87.633344	
Aurora	39.70308	-104.81208	Approximate location
Beaver Dam	43.46605	-88.83245	Approximate location
Centralia	38.526456	-89.126659	Approximate location
Darien	42.599306	-88.707549	Approximate location
Denver	39.72307	-104.95331	Approximate location
Fayetteville	36.06885	-94.16361	Approximate location
Fennville	42.59236	-86.102228	Approximate location
Ft. Madison	40.622412	-91.348842	Approximate location
Hagerstown	39.64085	-77.72167	Approximate location
Imlay City	43.016541	-83.075711	Approximate location
Jackson	35.64985	-88.835187	Approximate location
Richmond	49.159047	-123.136009	Approximate location
St. Elmo	39.024849	-88.852072	Approximate location
Waseca	44.081229	-93.507083	Approximate location

SW2.1

(SW2.1) Please propose any mutually beneficial water-related projects you could collaborate on with specific CDP supply chain members.

Requesting member

Please select

Category of project

Please select

Type of project

Please select

Motivation

Estimated timeframe for achieving project

Please select

Details of project

Projected outcome

SW2.2

(SW2.2) Have any water projects been implemented due to CDP supply chain member engagement?

No

SW3.1

(SW3.1) Provide any available water intensity values for your organization's products or services.

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission	Are you ready to submit the additional Supply Chain Questions?
I am submitting my response	Investors Customers	Public	Yes, submit Supply Chain Questions now

Please confirm below

I have read and accept the applicable Terms