

**Company Name** Conagra Brands  
**Industry** Agricultural Products (Supply Chain only)  
**UNGP Core Score (\*)** 1.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
0	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>1.5</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: General HRs commitment: The Company discloses in its Citizenship report 2019 that 'is committed to the following and requires the same of its suppliers: reducing environmental impacts such as deforestation, greenhouse gas emissions, and waste generation; protecting water resources through restorative or conservation efforts; supporting social needs in the communities in which it operates through philanthropic investment, diversity and inclusion, human rights practices'. However, no evidence found of a formal statement of policy commitment to respect human rights. [Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not met: UNGC principles 1 &amp; 2 [Code of Conduct, 12/2017: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not met: UDHR</li> <li>• Not met: International Bill of Rights: The Company discloses that 'All Conagra goods and services are sourced in accordance with our Supplier Code of Conduct, which incorporates the UN Guiding Principles on Business and Human Rights and the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work'. In addition, Conagra Brands states in its Supplier Code of Conduct that 'supports corporate responsibility to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, which states that business enterprises should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved. The responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work'. However, these commitments seem to be applied only for supply chain. No evidence found of statements of commitment to the mentioned initiatives including company's own operations. [Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a> &amp; Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: See above. [Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a> &amp; Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: ILO Core: The Company states in its Citizenship Report 2019 that 'Conagra Brands prohibits the use of any forced or compulsory labor, including human trafficking and slavery, in all of our operations. Any work performed by an employee or other individual that is involuntary and/or performed under the threat of physical harm or other penalty is strictly prohibited. Conagra Brands also complies with state and federal child labor laws through our hiring policies and human resources practices. Our standard entry-level wage is equal to—and often exceeds—the local minimum wage in locales in which we operate'. However, the Company does not have policy on freedom of association and collective bargaining for its own employees. [Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: Explicitly list All four ILO for AG suppliers: The Company states in its Code of Conduct for Suppliers that its suppliers must insure that no forced labour, be forbidden from using child labour in any circumstance, and must not discriminate in hiring and employment practices. In addition, the Company states that it 'requires that its suppliers recognize and respect the rights of employees to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>freely associate, organize and bargain collectively in accordance with the all applicable laws. Additionally, Conagra encourages its suppliers to establish open communication and direct engagement between employees and management as a means by which to support positive employee relations.' However, CHRB could not find alternative measures to support freedom of association and collective bargaining when they are restricted by law. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: The Company states in its Code of Conduct that it is committed to providing a safe and secure work environment and complying with all relevant legal requirements regarding health, safety and security. It also has policy on discrimination, child labour and forced labour. However, it does not have policy on freedom of association and collective bargaining. [Code of Conduct, 12/2017: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company states that 'working safely and protecting our environment is fundamental to the success of Conagra Brands. We are committed to continuous improvement as measured by our leading environmental and safety indicators through the implementation and refinement of our Key Concepts of Safety and Environment processes and our Environment, Health and Safety (EH&amp;S) management system approach'. [Environmental, Health and Safety philosophy, 2010: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The Company states in its Code of Conduct for Suppliers that its suppliers must insure that they have a safe and healthy working environment to include appropriate controls, safe procedures, preventative maintenance and appropriate protective equipment in compliance with all applicable laws and regulations. This is especially important when dealing with hazardous materials. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: On its Citizenship report 2018, the company states: 'We are accountable to a variety of stakeholders, each with a specific set of interests and expectations of our business. Maintaining an open dialogue is critical to creating mutual understanding and providing a basis for strategic decision-making'. On the 2019 report, it indicates: 'In 2017, we refreshed our materiality analysis to reflect current business strategies and stakeholder dialogues on relevant environmental, social and governance (ESG) topics'. However, no specific evidence found of a statement of commitment to engage with affected stakeholders. [Citizenship Report 2018, 2018: <a href="http://conagrabrands.com">conagrabrands.com</a> &amp; Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for AG in supply chain</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in AG supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company states in its Code of Conduct that it has EthicsPoint hotline available to encourage employees or associates to report violations or concerns. The code of conduct discloses alternative channels in the code of conduct. [Code of Conduct, 2020: <a href="https://conagrabrands.com">conagrabrands.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect AG supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AG supplier workers: The code of conduct refers to employees and associates in the context of grievance mechanisms. No evidence found that suppliers workers can access to the Company's mechanism. [Code of Conduct, 2020: <a href="https://conagrabrands.com">conagrabrands.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The Company describes the hotline reach method for Unites States and Canada, and all other countries.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		However, there is no instruction on language options. [Code of Conduct, 12/2017: <a href="http://conagrabrands.com">conagrabrands.com</a> ] <ul style="list-style-type: none"> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Not met: AG supplier communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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