

**Company Name** Conagra Brands  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score** 8.6 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
4.0	20	C. Remedies and Grievance Mechanisms
1.0	25	D. Performance: Company Human Rights Practices
1.7	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states in its Supplier Code of Conduct that it '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.' [Suppliers Code of Conduct, N/A: <a href="https://conagrabrands.com">conagrabrands.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commitment to the UNGPs: The Company states in its Supplier Code of Conduct that it '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.' [Suppliers Code of Conduct, N/A: <a href="https://conagrabrands.com">conagrabrands.com</a>] &amp; [Suppliers Code of Conduct, 30/10/2019: <a href="https://conagrabrands.com">conagrabrands.com</a>]</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Company has a commitment to the ILO Core</li> <li>Not Met: Company has a explicit commitment to All four ILO Core</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Company expect suppliers to commit to ILO Core</li> <li>Not Met: Company explicitly list All four ILO for suppliers: The Company's Supplier Code of Conduct includes provisions with respect all ILO Core. With respect freedom of association and collective bargaining it indicates: 'Conagra Brands</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			requires that its suppliers recognize and respect the rights of employees to 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, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with all applicable laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a> ]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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>• Met: Commitment to respect H&amp;S of workers: The Company indicates in its Code of Conduct: 'We are committed to creating an environment where everyone feels safe and returns home at the end of the day unharmed. This takes a team effort, so we work together, use common sense, and follow the health and safety laws applicable to our operations'. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The code for suppliers states that the '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> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Supplier Code reads: 'suppliers must comply with all applicable laws governing the number of maximum work hours, vacation time, leave periods, and holidays. Suppliers' employees shall not work beyond the maximum working hours permitted by applicable law. Suppliers will compensate for overtime hours in accordance with applicable laws'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	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: Respect land ownership and natural resources as set out in VGGT</li> <li>• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards</li> <li>• Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Respecting the right to water</li> <li>• Not Met: Company's policy commits to obtain FPIC</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	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: Women's rights</li> <li>• Not Met: Children's rights</li> <li>• Not Met: Migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect at least one of these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	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: The Company commits to remedy</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs</li> <li>• Not Met: Describe HR expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public: The company states that 'Our health and safety team audits each of our facilities every two years to ensure compliance with safety regulations and corporate policies.' However, no further information found and it is not clear the performance criteria. [Citizen Report 2020, 2021: <a href="https://www.conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Senior responsibility for HR implementation and decision making</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How it assigns Day-to-day responsibility</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives for human rights</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public: The company indicates that 'We [the company] will establish quantifiable targets and goals to track our progress and drive continuous improvement.' However, no further information found about the criteria or how these targets will be measured. [Global Environment, Occupational Health and Safety Philosophy, N/A: <a href="https://www.conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Review of other senior management performance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The company indicates that 'Communication also plays an important role in our food safety culture and it is delivered through many different channels such as: ongoing training, metrics reviews, sharing best practices through shift huddles and regular team meetings, and more.' However, no further information about communication of policy to workers. [Citizen Report 2020, 2021: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Requires suppliers to communicate policy requirements</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Not Met: How workers are trained on HR policy commitments: The Company indicates: 'All new employees are required to take a course on our Code of Conduct as part of their onboarding process. We conduct annual trainings to ensure that employees are aware of our expectations and their obligations under the Code of Conduct'. However, it is not clear the topics or how workers are trained on the company's HR policies. [Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment: The Company states that "Conagra Brands require compliance with relevant human rights policies throughout our supply chain". However, it is not clear if the Company trains suppliers on company's HR policies. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain</li> <li>• Not Met: Proportion of supply chain monitored</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective action process</li> <li>• Not Met: Disclose findings and number of corrective action</li> </ul>
B.1.7	Engaging and terminating business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: The Company states that it has a "rigorous process in place to ensure it has the appropriate documentation from its suppliers. Its Supplier Quality team reviews all materials to be purchased, where those materials come from, the potential supplier's third party audit, proposed final use of the material and other information about the material or supplier. In addition, the Company discloses that 'the Supplier Quality team also looks at new suppliers ' conformance with specific expectations set forth in our Supplier Expectations Manual. These due diligence screens specifically include criteria related to environmental compliance, child labor and human trafficking.'" [Citizenship Report</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a> ] & [Supplier Expectations Manual, 08/2021: <a href="http://conagrabrands.com">conagrabrands.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: HR affects on-going supplier relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations</li> <li>• Not Met: Identifying risks through relevant business relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues</li> <li>• Not Met: How process applies to supply chain [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks</li> <li>• Not Met: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

## C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<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>• 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. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages and workers aware: The Company states in its Code of Conduct that 'You may also report suspected violations of the Code, company policies, or the law, or other concerns, through EthicsPoint (an outside third-party reporting company) either by phone or online. The channel is translated into Spanish, English, Chinese and there is a toll-free line for other languages. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Describe how workers in the supply chain have access to grievance mechanism [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<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>• Met: Grievance mechanism for community: The Company describes that anyone who witness a violation can report it through a phone call or in a online report. In addition, the company state " You may also report suspected violations of the Code, company policies, or the law, or other concerns, through EthicsPoint (an outside third-party reporting company) either by phone or online. It is helpful when you identify yourself, as it enables us to follow-up and provide feedback when appropriate. But, if you wish, you may report any concerns anonymously and confidentially through the EthicsPoint Hotline." [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages and stakeholder awareness: The Company provides three language options and also a website that can be use internationally with a 'Toll-Free Number.' [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Communities access mechanism direct or through suppliers</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	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: Response timescales and how complainants will be informed: The Company states that 'We promptly investigate all reports of conduct suspected to violate the Code, company policy, or the law, and determine an appropriate course of action. Reports of violations or potential violations should include as much detailed information as possible to allow us to investigate and take appropriate responsive action'. However, it is not clear enough about its timescales and the response for complainants. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Describe support (technical, financial,etc) available for equal access by complainants: The Company in its Code of Conduct does not describe how and which support will be conducted for each complaint. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Escalation to senior/independent level</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation: The Company state that "We support open and honest communication and encourage our employees and others with whom we do business to ask questions and report concerns. We do not tolerate retaliation. Retaliation against any individual who, in good faith, seeks advice, raises concerns, or reports misconduct pursuant to the Code is strictly</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>prohibited. Any employee found to have engaged in retaliatory conduct may be subject to discipline, including termination of employment." [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Practical measures to prevent retaliation: The Company indicates that 'any concerns can be reported anonymously and confidentially through the EthicsPoint Hotline'. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company states that 'Expecting our business partners (suppliers, contractors, etc.) to act in a way that is consistent with our standards for fair treatment and equal opportunity'. However, it is not clear if they can access to the grievance mechanisms and are covered by the non-retaliation commitment, as the grievance mechanisms are deemed for employees and associates. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse 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: Describes how remedy has been provided</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Number grievances filed, addressed or resolved and outcome achieved</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	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: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company states that its suppliers must provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards. However, no evidence found of the Company requiring suppliers to pay a living wage that has to include basic needs for employee and his/her dependents, and providing some discretionary income. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with 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: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes: The Company states in its Supplier Code of Conduct that 'Suppliers must provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards'. However, it does not specify any practices adopted to pay suppliers in time and withing agreeable timelines. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company states that its Supplier Excellence Program includes top direct material suppliers, which represent 75% of its overall direct materials spend. However, no description found on how it traces suppliers back to manufacturing locations. [Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities: The Company states that ' As part of our Supplier Excellence Program, Conagra Brands assesses key suppliers at least annually on Environmental, Social and Governance (ESG) risk related performance and disclosure'. However, no further information found and it does not disclose any direct or indirect suppliers involved in higher-risk activities. [Code of Conduct, 2020: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul>
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Child Labour rules in codes or contracts: The Company states: 'Conagra Brands suppliers and their subcontractors are forbidden from using child labor in any circumstance. The term "child" refers to any person employed under the age of 15 (or 14 where the applicable laws permit). Conagra Brands suppliers must insure proper employment of minors at all stage of farming, manufacturing, delivering and processing the finished goods.' However, it does not include verifying the age of job applicants and workers and remediation programmes. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on child labour</li> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The Company states in its Supplier Code of Conduct that "We prohibit assessment of recruitment or other fees by Conagra Brands suppliers, and surrendering of identification, as a condition of employment. Any fees incurred by Conagra Brands suppliers when using employment agencies in the hiring or recruiting of workers must be paid by Conagra Brands suppliers and such fees cannot later be assessed against workers." [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on debt &amp; fees</li> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Suppliers to pay workers in full and on time in codes or contracts: The Company states in its Supplier Code of Conduct that 'Suppliers must provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards'. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Free movement rules in codes or contracts</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: FoA &amp; CB rules in codes or contracts: Conagra Brands discloses that 'requires that its suppliers recognize and respect the rights of employees to 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, there is no mention to the prohibition of intimidation, harassment, retaliation and violence against union members and union representatives. [Suppliers Code of Conduct, 30/10/2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>Not Met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Sets out clear Health and Safety requirements</li> <li>Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company indicates: 'The Incident Rate (OIR) was 2.28 incidents per 100 full-time workers, which is below the industry average of 4.21 for companies in the food manufacturing sector.' [Citizenship Report 2019, 2019: <a href="http://conagrabrands.com">conagrabrands.com</a>]</li> <li>Not Met: Fatalities rate for lasting reporting period</li> <li>Not Met: Occupation disease rate for last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: How working with suppliers on H&amp;S</li> <li>Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Rules on land &amp; owners in codes or contracts</li> <li>Not Met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Includes resettlement requirements that the supplier provides financial compensation</li> <li>Not Met: Assessment of the number affected by land rights issues in its SP</li> <li>Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Rules on water stewardship in codes or contracts</li> <li>Not Met: How working with suppliers on water stewardship issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Assessment on the number affected by lack of access to water and sanitation</li> <li>Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Women's rights in codes or contracts</li> <li>Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>Not Met: Provides analysis of trends demonstrating progress</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

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, and so the score of 6.90 out of 80 points scored in themes A-D has been applied to produce a score of 1.73 out of 20 points for theme E.

### 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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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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