
Conagra Brands CDP Forests 2021 Report



DISCLOSURE INSIGHT ACTION

F0. Introduction

F0.1

(F0.1) 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's iconic brands, such as Birds Eye®, Duncan Hines®, Healthy Choice®, Marie Callender's®, Reddi-wip®, and Slim Jim®, as well as emerging brands, including Angie's® BOOMCHICKAPOPOP®, Duke's®, Earth Balance®, Gardein®, and Frontera®, offer choices for every occasion. For more information, visit www.conagrabrands.com. Information in this disclosure reflects best estimates given existing data systems.

F0.2

(F0.2) State the start and end date of the year for which you are reporting data.

	Start Date	End Date
Reporting year	June 1 2019	May 31 2020

F0.3

(F0.3) Select the currency used for all financial information disclosed throughout your response.

USD

F0.4

(F0.4) Select the forest risk commodity(ies) that you are, or are not, disclosing on (including any that are sources for your processed ingredients or manufactured goods); and for each select the stages of the supply chain that best represents your organization's area of operation.

	Commodity disclosure	Stage of the value chain	Explanation if not disclosing
Timber products	Disclosing	Manufacturing	<Not Applicable>
Palm oil	Disclosing	Manufacturing	<Not Applicable>
Cattle products	Disclosing	Manufacturing	<Not Applicable>
Soy	Disclosing	Manufacturing	<Not Applicable>
Other - Rubber	This commodity is not produced, sourced or used by our organization	<Not Applicable>	<Not Applicable>
Other - Cocoa	Disclosing	Manufacturing	<Not Applicable>
Other - Coffee	Not disclosing	Manufacturing	

F0.5

(F0.5) Are there any parts of your direct operations or supply chain that are not included in your disclosure?

Yes

F0.5a

(F0.5a) Identify the parts of your direct operations or supply chain that are not included in your disclosure.

Value chain stage	Exclusion	Description of exclusion	Potential for forests-related risk	Please explain
Direct operations	Facility	Office paper use and timber building and construction applications, as well as onsite facility food services uses of palm, soy and beef are excluded.	Potential for forests-related risk but not evaluated	This disclosure focuses on timber uses for primary, secondary and tertiary packaging purposes, representing more than 90% of our purchasing for this commodity. Packaging covers the most significant uses of timber products and accurately represents our supply chain impact on deforestation issues related to this commodity. We estimate that onsite facility food service and office paper use, timber building and construction, and other miscellaneous uses represent such a small percentage of soy, beef, palm oil and timber footprints that they are not material to disclose.
Direct operations	Specific product line(s)	We have excluded data for private label and most foodservice products due to lack of decision-making control over product design and sustainable commodity sourcing and divestment of our private label business in February 2016. Financial data in this disclosure covers fiscal year 2019 Conagra Brands' uses of soy products across margarine and oil brands, Banquet®, Marie Callender's®, Chef Boyardee®, Healthy Choice®, and Slim Jim® products. These products use more than 80% of our soy procurement poundage across oil, derivatives, and lecithin. For the purposes of revenue calculation, we have excluded other brands in our portfolio where soy is not a key ingredient. Financial data in this disclosure covers Conagra Brands' uses of palm oil in popcorn, spreads and pudding. These products represent more than 90% of our total palm oil poundage. We have excluded other brands in our portfolio that use only nominal amounts of palm oil. Financial data in this disclosure covers Conagra Brands' largest volume use of beef in Duke's®, Slim Jim®, Hebrew National®, Chef Boyardee®, Banquet® and Marie Callender's® products. These products use most of our procured beef supply. We have excluded other brands in our portfolio that use nominal amounts of this commodity.	Potential for forests-related risk but not evaluated	We believe this disclosure accurately represents the company's relevant impact on related deforestation issues. Revenue data in this disclosure (F1.2) covers Conagra Brands' most significant uses of palm oil, beef, and soy in branded products, representing our key suppliers for these commodities and most our purchasing spend and tonnage for each commodity. Our timber disclosure focuses on paper-based packaging materials which are used in some way for virtually all products and brands in our portfolio.

F1. Current state

F1.1

(F1.1) How does your organization produce, use or sell your disclosed commodity(ies)?

Timber products

Activity

Distributing/packaging

Form of commodity

Primary packaging

Secondary packaging

Tertiary packaging

Source

Contracted suppliers (processors)

Contracted suppliers (manufacturers)

Country/Area of origin

Canada

United States of America

% of procurement spend

11-20%

Comment

Fiber-based packaging is used for virtually all 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.

Palm oil

Activity

Using as input into product manufacturing

Form of commodity

Crude palm oil (CPO)
Refined palm oil
Palm oil derivatives
Palm kernel oil derivatives

Source

Contracted suppliers (processors)
Contracted suppliers (manufacturers)

Country/Area of origin

Indonesia
Malaysia

% of procurement spend

1-5%

Comment

Palm oil is primarily used in Orville Redenbacher's® and ACT II® microwave popcorn, margarine products and Swiss Miss and Hunt's® Snack Pack puddings and Peter Pan® peanut butter. To prepare for 100% RSPO Mass Balance adoption by 2020, we have secured supply chain certification for 100% of our production facilities that use palm oil. Certification of these facilities enable use of Mass Balance-certified oil for 100% of our consumption.

Cattle products

Activity

Using as input into product manufacturing

Form of commodity

Beef

Source

Contracted suppliers (processors)
Contracted suppliers (manufacturers)

Country/Area of origin

Brazil
Canada
United States of America
Uruguay

% of procurement spend

6-10%

Comment

Beef is the primary ingredient in Slim Jim® meat snacks and Hebrew National® kosher franks, as well as some Duke's® meat snack products. It is also an ingredient in select Banquet® and Marie Callender's® offerings, Chef Boyardee® beef ravioli and other canned pasta products.

Soy

Activity

Using as input into product manufacturing

Form of commodity

Whole soy beans
Soy bean oil
Soy bean meal
Soy derivatives

Source

Trader/broker/commodity market
Contracted suppliers (processors)
Contracted suppliers (manufacturers)

Country/Area of origin

United States of America

% of procurement spend

1-5%

Comment

Soy products are mainly used as ingredients in oils, plant-based protein products such as Gardein®, Banquet® frozen products, Marie Callender's® pies, Chef Boyardee® canned pasta products, Healthy Choice® frozen meals, and Slim Jim® meat snacks.

Other - Cocoa

Activity

Using as input into product manufacturing

Form of commodity

Other, please specify (Cocoa powder, cocoa products)

Source

Contracted suppliers (processors)
Contracted suppliers (manufacturers)

Country/Area of origin

Cameroon
Côte d'Ivoire
Ghana
Indonesia
Malaysia
Nigeria

% of procurement spend

<1%

Comment

Cocoa is used primarily in Conagra Brands' products such as Swiss Miss® hot cocoa mix, Snack Pack® puddings, and Marie Callender's® desserts.

F1.2

(F1.2) Indicate the percentage of your organization's revenue that was dependent on your disclosed forest risk commodity(ies) in the reporting year.

	% of revenue dependent on commodity	Comment
Timber products	91-99%	Our full product portfolio uses paper as either a primary package (e.g. microwave popcorn bag or other fiber-based container), a secondary package (e.g. folding carton for frozen meals), and/or tertiary packaging (e.g. corrugated shipping container) to protect products from damage in route to retailers and ultimately provide safe food for consumers. Timber products are vital to allowing Conagra Brands to deliver product for sale.
Palm oil	6-10%	Revenue data in this disclosure covers Conagra Brands' major uses of palm oil in popcorn, margarine tubs and sticks and pudding, specifically Earth Balance®, Smart Balance®, Parkay®, Blue Bonnet®, Orville Redenbacher's®, ACT II®, Snack Pack®, and Angie's® brands.
Cattle products	11-20%	Revenue data in this disclosure covers Conagra Brands' major uses of beef in meat snacks, hot dogs, canned meat products and frozen meals, specifically Armour®, Duke's®, Slim Jim®, Hebrew National®, Wolf®, Chef Boyardee®, Libby's®, and select frozen meal brands.
Soy	1-5%	Revenue data in this disclosure covers Conagra Brands' uses of soy as a major ingredient in meat replacement and margarine brands, including Gardein®, Earth Balance®, Smart Balance®, Parkay®, and Blue Bonnet® products.
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	1-5%	Revenue data in this disclosure includes cocoa used in puddings and hot cocoa mix for Snack Pack® and Swiss Miss® brands, and Marie Callender's® dessert products.
Other - Coffee	<Not Applicable>	<Not Applicable>

F1.5

(F1.5) Does your organization collect production and/or consumption data for your disclosed commodity(ies)?

	Data availability/Disclosure
Timber products	Consumption data available, disclosing
Palm oil	Consumption data available, disclosing
Cattle products	Consumption data available, disclosing
Soy	Consumption data available, disclosing
Other - Rubber	<Not Applicable>
Other - Cocoa	Consumption data available, disclosing
Other - Coffee	<Not Applicable>

F1.5a

(F1.5a) Disclose your production and/or consumption data.

Forest risk commodity

Timber products

Data type

Consumption data

Volume

253786

Metric

Other, please specify (US short tons)

Data coverage

Full commodity production/consumption

Please explain

<Not Applicable>

Forest risk commodity

Soy

Data type

Consumption data

Volume

261999985

Metric

Other, please specify (lbs)

Data coverage

Full commodity production/consumption

Please explain

<Not Applicable>

Forest risk commodity

Palm oil

Data type

Consumption data

Volume

75670

Metric

Other, please specify (tonnes)

Data coverage

Full commodity production/consumption

Please explain

<Not Applicable>

Forest risk commodity

Cattle products

Data type

Consumption data

Volume

222253519

Metric

Other, please specify (lbs)

Data coverage

Full commodity production/consumption

Please explain

<Not Applicable>

Forest risk commodity

Other - Cocoa

Data type

Consumption data

Volume

17662819

Metric

Other, please specify (lbs)

Data coverage

Full commodity production/consumption

Please explain

<Not Applicable>

F1.5b

(F1.5b) For your disclosed commodity(ies), indicate the percentage of the production/consumption volume sourced by national and/or sub-national jurisdiction of origin.

Forest risk commodity

Timber products

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

<Not Applicable>

% of total production/consumption volume

100

Please explain

100% of our fiber packaging is sourced from suppliers in the U.S. and Canada, which are not forest risk countries.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Johor)

% of total production/consumption volume

9

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Malaysia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Sabah)

% of total production/consumption volume

9

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Malaysia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Pahang)

% of total production/consumption volume

9

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Malaysia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Perak)

% of total production/consumption volume

9

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Malaysia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Negeri Semb)

% of total production/consumption volume

9

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Malaysia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Riau)

% of total production/consumption volume

9.17

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Indonesia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Bengkulu)

% of total production/consumption volume

9.17

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Indonesia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Sumatra)

% of total production/consumption volume

9.17

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Indonesia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Jambi)

% of total production/consumption volume

9.17

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Indonesia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Aceh)

% of total production/consumption volume

9.16

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Indonesia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Kalimantan)

% of total production/consumption volume

9.16

Please explain

We calculate the percentage of palm oil sourced from each state/jurisdiction in Indonesia based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Cattle products

Country/Area of origin

Brazil

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Sao Paulo)

% of total production/consumption volume

2.5

Please explain

We calculate the percentage of beef sourced from each state/jurisdiction in Brazil based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Cattle products

Country/Area of origin

Brazil

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Rio Grande Sul)

% of total production/consumption volume

2.5

Please explain

We calculate the percentage of beef sourced from each state/jurisdiction in Brazil based on best available data from suppliers, assuming even distribution of production across identified areas.

Forest risk commodity

Cattle products

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

<Not Applicable>

% of total production/consumption volume

95

Please explain

US is the primary sourcing region for beef, with a small percentage of total procured beef sourced from Canada and Uruguay. This metric was calculated based on known volumes sourced from suppliers.

Forest risk commodity

Soy

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

<Not Applicable>

% of total production/consumption volume

100

Please explain

100% of our soy products relevant to this disclosure are sourced from the U.S.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Bas-Sassandra District)

% of total production/consumption volume

5.5

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Identified sourcing regions within the country are based on supplier disclosures and an analysis of country-specific cocoa growing regions from the World Bank and peer-reviewed academic literature. We calculate the percentage sourced from each state/jurisdiction based on best available data from suppliers, assuming even distribution of production across identified areas. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Montagnes)

% of total production/consumption volume

5.5

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Identified sourcing regions within the country are based on supplier disclosures and an analysis of country-specific cocoa growing regions from the World Bank and peer-reviewed academic literature. We calculate the percentage sourced from each state/jurisdiction based on best available data from suppliers, assuming even distribution of production across identified areas. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Marahoué)

% of total production/consumption volume

5.5

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Identified sourcing regions within the country are based on supplier disclosures and an analysis of country-specific cocoa growing regions from the World Bank and peer-reviewed academic literature. We calculate the percentage sourced from each state/jurisdiction based on best available data from suppliers, assuming even distribution of production across identified areas. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction (Gôh-Djiboua)

% of total production/consumption volume

5.5

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Identified sourcing regions within the country are based on supplier disclosures and an analysis of country-specific cocoa growing regions from the World Bank and peer-reviewed academic literature. We calculate the percentage sourced from each state/jurisdiction based on best available data from suppliers, assuming even distribution of production across identified areas. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Nigeria

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

6

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Cameroon

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

21

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

8

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

8

Please explain

The percentage of supply sourced from this geography is an estimate based on our suppliers' sourcing information and the latest available global cocoa production data from the FAO and ICCO. Sourcing from this geography is covered by supplier zero deforestation policies and aerial monitoring systems.

Forest risk commodity

Other - Cocoa

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

<Not Applicable>

% of total production/consumption volume

35

Please explain

The remainder of our cocoa is sourced from countries that are not considered forest-risk regions, primarily Ghana.

F1.5e

(F1.5e) How does your organization produce or consume biofuel derived from palm oil?

Does your organization produce or consume biofuel derived from palm oil?

No

Data type

<Not Applicable>

Volume produced/consumed

<Not Applicable>

Metric

<Not Applicable>

Country/Area of origin

<Not Applicable>

State or equivalent jurisdiction

<Not Applicable>

% of total production/consumption volume

<Not Applicable>

Does the source of your organization's biofuel material come from smallholders?

<Not Applicable>

Comment

F1.6

(F1.6) Has your organization experienced any detrimental forests-related impacts?

Yes

F1.6a

(F1.6a) Describe the forests-related detrimental impacts experienced by your organization, your response, and the total financial impact.

Forest risk commodity

Timber products

Impact driver type

Reputational and markets

Primary impact driver

Increased commodity prices

Primary impact

Increased production costs

Description of impact

Consumer demand for sustainable fiber packaging in the food industry has grown over the past several years to \$3.6 billion dollars in the US, Conagra's primary market (IRI sales data, 52 weeks ending Jan 2020), driving more paper fiber suppliers for our industry to invest in sustainable sourcing programs and communications. The scale of this impact is minor.

Primary response

Engagement with suppliers

Total financial impact

0

Description of response

Conagra Brands chooses to do business with paper fiber suppliers with strong sourcing sustainability policies, and verification and traceability efforts. Our procurement and R&D sustainability teams annually assess paper fiber suppliers covering approximately 98% of our volume on sustainability practices as part of Conagra's Supplier Excellence Program. The outcome of this assessment is company knowledge that approximately 90% of virgin fiber for fiber-based packaging is sourced from suppliers utilizing Forest Stewardship Council (FSC) or Sustainable Forestry Initiative (SFI) certified mills. We further updated our Supplier Code of Conduct in 2019 to specify that Conagra Brands does not directly source paper fiber from areas at high risk for deforestation, specifically natural forests in Sumatra, Borneo, New Guinea, and the Russian Far East. The outcome was enhanced sustainable packaging attributes for all our paper fiber-based packaging. We did not experience significant financial impacts from this driver that would be defined as substantive for meeting the threshold for external reporting/public disclosure.

Forest risk commodity

Soy

Impact driver type

Physical

Primary impact driver

Changes in precipitation patterns

Primary impact

Supply chain disruption

Description of impact

In recent years, droughts in South America caused supply disruptions in that region and a shift in global soy demand to U.S. production. We did not experience significant

financial impacts from this driver that would be defined as substantive for meeting the threshold for external reporting/public disclosure.

Primary response

Engagement with suppliers

Total financial impact

0

Description of response

We engage closely with our suppliers via monthly market calls to understand global supplies and demand to better manage risk. We work to avoid single sourced situations to ensure supply access and manage costs effectively. We assign a primary supplier due to proximity of facilities, with approved secondary suppliers that may be further away logistically. In addition, our suppliers often have multiple refineries they can source from. Conagra Brands discloses financial impacts in compliance with applicable regulations. One outcome from this response was increased engagement by Conagra's Senior Director of Sustainability with USFRA to better understand long-term soy sustainability opportunities within the US. Conagra Brands did not experience a material financial impact from this driver warranting external disclosure based on this approach.

Forest risk commodity

Palm oil

Impact driver type

Physical

Primary impact driver

Increased severity of extreme weather events

Primary impact

Supply chain disruption

Description of impact

Palm oil production in Indonesia and Malaysia was adversely affected in 2019-2020 by drought. This required us to source alternate supply. Conagra Brands did not experience a material financial impact from this driver.

Primary response

Engagement with suppliers

Total financial impact

0

Description of response

We minimize weather-related supply chain disruption risks and impacts by diversifying suppliers and sourcing geographies. The outcome was increased engagement of Conagra's sustainability team with our largest palm oil supplier to better understand how sustainability risks are mitigated. Conagra Brands did not experience a material financial impact from this driver warranting external disclosure based on this approach.

Forest risk commodity

Cattle products

Impact driver type

Reputational and markets

Primary impact driver

Shifts in consumer preference

Primary impact

Change in revenue mix and sources

Description of impact

Increased consumer demand for sustainably sourced beef has driven beef suppliers to increase investments in sustainable ranching practices, which has in turn impacted the sustainability profile of our product offerings. Conagra Brands did not experience a material financial impact from this driver.

Primary response

Engagement with suppliers

Total financial impact

0

Description of response

Two of Conagra's core beef suppliers are active in the US Roundtable for Sustainable Beef and have adopted their framework and best practices in sustainable beef production, which was publicly announced in 2019. This shift in the sustainability of the beef within our existing supply chain has improved the sustainability of our beef offerings, without a change in our procurement practices. Conagra Brands did not experience a material financial impact from this driver warranting external disclosure based on this approach.

F2. Procedures

F2.1

(F2.1) Does your organization undertake a forests-related risk assessment?

Yes, forests-related risks are assessed

F2.1a

(F2.1a) Select the options that best describe your procedures for identifying and assessing forests-related risks.

Timber products

Value chain stage

Supply chain

Coverage

Partial

Risk assessment procedure

Assessed as part of other company-wide risk assessment system

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Tools and methods used

Internal company methods

Jurisdictional/landscape assessment

Other, please specify (Third-party research reports)

Please explain

Conagra Brands considers several internal and external factors to inform our landscape assessment to identify and assess Timber-related risks. Our internal Responsible Sourcing Materiality Matrix leverages input from our procurement commodity buyers, technical category leads, and subject matter experts. Internal risk factors considered include annual spend percentage, risks to business continuity and brand disruption, drivers in the food industry such as customer demand and investor pressure, and known environmental and social issues. Our landscape assessment leverages data from third-party research and reports including the Ceres' Engage the Chain, which provides an overview of the environmental and social risks and impacts of agricultural commodities, including fiber-based packaging. We chose this tool as a method to understand and identify forests-related risks in our supply chain because Ceres is a reputable, third-party non-profit. Ceres' risks outlined in the Engage the Chain tool were incorporated into our commodity risk assessment. Identified risks are also monitored and reassessed during major acquisitions or at a minimum of every three to five years. Conagra Brands uses these tools and assessments to support prioritization of materials and inform the policies needed to mitigate those risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies. In addition to reviewing internal and external factors, Conagra brands rates our largest suppliers, representing ~60% of ingredient spend, within our Supplier Excellence program on sustainability performance, based on a review of annual sustainability reports and related documents and supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP forestry questionnaire, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry such as deforestation. Our purchases of commodities are managed by a dedicated procurement officer who conducts ongoing sustainability and deforestation issues tracking via news sources.

Palm oil

Value chain stage

Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of other company-wide risk assessment system

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Tools and methods used

Internal company methods

Jurisdictional/landscape assessment

Other, please specify (Third-party research reports)

Please explain

Conagra Brands considers several internal and external factors in identifying and assessing palm oil-related risks. Our internal Responsible Sourcing Materiality Matrix leverages input from our procurement commodity buyers, technical category leads, and subject matter experts. Internal risk factors considered include annual spend percentage, risks to business continuity and brand disruption, drivers in the food industry such as customer demand and investor pressure, and known environmental and social issues. Our landscape assessment leverages data from third-party research and reports including the Ceres' Engage the Chain, which provides an overview of the environmental and social risks and impacts of agricultural commodities, including palm oil. We chose this tool as a method to understand and identify forests-related risks in our supply chain because Ceres is a reputable, third-party non-profit. Ceres' risks outlined in the Engage the Chain tool were incorporated into our commodity risk assessment. Identified risks are also monitored and reassessed during major acquisitions or at a minimum of every three to five years. Conagra Brands uses these tools and assessments to support prioritization of materials and inform the policies needed to mitigate those risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies. In addition to reviewing internal and external factors, Conagra brands rates our largest suppliers, representing 60% of ingredient spend, within our Supplier Excellence program on sustainability performance, based on a review of annual sustainability reports and related documents and supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP forestry questionnaire, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry such as deforestation. Our purchases of commodities are managed by a dedicated procurement officer who conducts ongoing sustainability and deforestation issues tracking via news sources.

Cattle products

Value chain stage

Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of other company-wide risk assessment system

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Tools and methods used

Internal company methods

Jurisdictional/landscape assessment

Other, please specify (Third-party research reports)

Please explain

Conagra Brands considers several internal and external factors in identifying and assessing cattle-related risks. Our internal Responsible Sourcing Materiality Matrix leverages input from our procurement commodity buyers, technical category leads, and subject matter experts. Internal risk factors considered include annual spend percentage, risks to business continuity and brand disruption, drivers in the food industry such as customer demand and investor pressure, and known environmental and social issues. Our landscape assessment leverages data from third-party research and reports including Ceres' Engage the Chain, which provides an overview of the environmental and social risks and impacts of agricultural commodities, including beef. We chose this tool as a method to understand and identify forests-related risks in our supply chain because Ceres is a reputable, third-party non-profit. Ceres' risks outlined in the Engage the Chain tool were incorporated into our commodity risk assessment. Identified risks are also monitored and reassessed during major acquisitions or at a minimum of every three to five years. Conagra Brands uses these tools and assessments to support prioritization of materials and inform the policies needed to mitigate those risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies. In addition to reviewing internal and external factors, Conagra brands rates our largest suppliers, representing 60% of ingredient spend, within our Supplier Excellence program on sustainability performance, based on a review of annual sustainability reports and related documents and supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP forestry questionnaire, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry such as deforestation. Our purchases of commodities are managed by a dedicated procurement officer who conducts ongoing sustainability and deforestation issues tracking via news sources.

Soy

Value chain stage

Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of other company-wide risk assessment system

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Tools and methods used

Internal company methods

Jurisdictional/landscape assessment

Other, please specify (Third-party research reports)

Please explain

Conagra Brands considers several internal and external factors in identifying and assessing soy-related risks. Our internal Responsible Sourcing Materiality Matrix leverages input from our procurement commodity buyers, technical category leads, and subject matter experts. Internal risk factors considered include annual spend percentage, risks to business continuity and brand disruption, drivers in the food industry such as customer demand and investor pressure, and known environmental and social issues. Our landscape assessment leverages data from third-party research and reports including Ceres' Engage the Chain, which provides an overview of the environmental and social risks and impacts of agricultural commodities, including soy. We chose this tool as a method to understand and identify forests-related risks in our supply chain because Ceres is a reputable, third-party non-profit. Ceres' risks outlined in the Engage the Chain tool were incorporated into our commodity risk assessment. Identified risks are also monitored and reassessed during major acquisitions or at a minimum of every three to five years. Conagra Brands uses these tools and assessments to support prioritization of materials and inform the policies needed to mitigate those risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies. In addition to reviewing internal and external factors, Conagra brands rates our largest suppliers, representing ~60% of ingredient spend, within our Supplier Excellence program on sustainability performance, based on a review of annual sustainability reports and related documents and supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP forestry questionnaire, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry such as deforestation. Our purchases of commodities are managed by a dedicated procurement officer who conducts ongoing sustainability and deforestation issues tracking via news sources.

Other - Cocoa

Value chain stage

Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of other company-wide risk assessment system

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Tools and methods used

Internal company methods

Jurisdictional/landscape assessment

Other, please specify (Third-party research reports)

Please explain

Conagra Brands considers several internal and external factors in identifying and assessing cocoa-related risks. Our internal Responsible Sourcing Materiality Matrix leverages input from our procurement commodity buyers, technical category leads, and subject matter experts. Internal risk factors considered include annual spend percentage, risks to business continuity and brand disruption, drivers in the food industry such as customer demand and investor pressure, and known environmental and social issues. Our landscape assessment leverages data from third-party research and reports, including Ceres' Engage the Chain, which provides an overview of the environmental and social risks and impacts of agricultural commodities, including cocoa. We chose this tool as a method to understand and identify forests-related risks in our supply chain because Ceres is a reputable, third-party non-profit. Ceres' risks outlined in the Engage the Chain tool were incorporated into our commodity risk assessment. Identified risks are also monitored and reassessed during major acquisitions or at a minimum of every three to five years. Conagra Brands uses these tools and assessments to support prioritization of materials and inform the policies needed to mitigate those risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies. In addition to reviewing internal and external factors, Conagra brands rates our largest suppliers, representing ~60% of ingredient spend, within our Supplier Excellence program on sustainability performance, based on a review of annual sustainability reports and related documents and supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP forestry questionnaire, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry such as deforestation. Our purchases of commodities are managed by a dedicated procurement officer who conducts ongoing sustainability and deforestation issues tracking via news sources.

F2.1b

(F2.1b) Which of the following issues are considered in your organization's forests-related risk assessment(s)?

Availability of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

Commodity availability drives our product packaging and food production, both of which are essential to differentiating our products to customers and consumers, maintaining business relationships and market share. A dedicated Conagra Brands procurement manager conducts ongoing monitoring of commodity availability, price and quality. Significant changes in quality and availability prompts a review of our supplier base and opportunities for diversification. Conagra Brands uses these reviews to support prioritization of materials and inform the policies needed to mitigate risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies.

Quality of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

Commodity quality drives our product packaging and ingredient quality, both of which are essential to differentiating our products to customers and consumers, maintaining business relationships and market share. A dedicated Conagra Brands procurement manager conducts ongoing monitoring of commodity availability, price and quality. Quality is monitored for our entire value chain, through ongoing supplier conversations and quarterly reviews that encompass sourcing where relevant, to consumer engagement around product experiences managed 24 hours/day by Conagra Brands' consumer affairs team. Significant changes in quality and availability prompts a review of our supplier base and opportunities for diversification.

Impact of activity on the status of ecosystems and habitats

Relevance & inclusion

Relevant, always included

Please explain

This information is critical to understanding our suppliers' ability to provide required quantities of commodities on a consistent basis. Without sustainable ecosystem management at the forest level, Conagra Brands is at risk for negative media and consumer campaigns, supply and price variations that can impact our operational costs. Our ability to provide the commodities and volume needed to deliver a safe product to consumers in compliance with regulations could be compromised. Conagra Brands' vice president of packaging R&D and its manager of procurement maintain ongoing relationships with our major of fiber-based packaging to monitor activities related to supplier sustainability, including ecosystem and habitat impacts. Conagra Brands sources palm oil from RSPO-certified suppliers complying with relevant RSPO ecosystem management standards, and from suppliers adhering to WWF's Palm Oil Buyers' Scorecard requirements, which include ecosystem preservation measures such as: implementation of the RSPO New Plantings Procedure excluding cultivation on peat soils and clearance of high carbon stock areas; restoration of any plantations on peat at the end of the current rotation; ceasing use of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat; and no sourcing of Fresh Fruit Bunches (FFB) from designated or protected areas such as national parks. We use our RSPO membership and supplier dialogues through our procurement team to continuously monitor any suppliers for ecosystem impacts outside of WWF or RSPO guidelines. Conagra Brands' senior procurement director and procurement manager for beef maintain ongoing relationships with our major suppliers such as JBS and receive updates on activities related to ecosystem and habitat preservation. In 2017, Conagra Brands included new sustainability metrics in our Supplier Excellence Program scoring applying to our major palm, beef, timber fiber and soy suppliers, among others. These metrics include public supplier response to CDP water, forestry and investor questionnaires; GRI-compliant reporting; and policy/commitments adequately addressing sustainability risks specific to the supplier's industry, including ecosystem management and deforestation.

Regulation

Relevance & inclusion

Relevant, always included

Please explain

This information is critical to Conagra Brands' understanding of requirements to produce and sell our products in target markets, as well as suppliers' ability to provide required quantities of a commodity on a consistent basis. Regulation impacts our production costs and license-to-operate, which in turn can impact product availability, price, business relationships and market share. Conagra Brands' Washington, DC-based government affairs staff person regularly updates our senior director responsible for sustainability strategy on state and federal US legislation related to sustainable commodity sourcing, as well as international legislation that may impact our sourcing. Proposed changes in regulation that may impact our business prompt cross-functional meetings between procurement, sustainability, legal and other relevant teams within Conagra Brands to develop a tailored response strategy. Conagra Brands' senior director responsible for sustainability strategy maintains industry relationships with packaging organizations such as AMERIPEN that include regular meetings and communications about emerging regulation. Conagra Brands was a founding member and a representative previously served as an officer of the AMERIPEN Board. We use our RSPO membership and supplier dialogues through our procurement team to continuously monitor for proposed changes in regulation impacting our supply chain. Conagra Brands procurement staff closely monitors EPA regulations on biofuel and the corresponding impact on soybean oil, soybean meal and soy derivatives. Our risk management team monitors our entire supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance.

Climate change

Relevance & inclusion

Relevant, always included

Please explain

Climate change was identified as a critical topic for Conagra Brands in our company-wide materiality assessment, and climate-change related issues are included as factors in our responsible sourcing risk assessment process that is completed for key commodities. It is also a topic noted as a business risk in our SEC filings and annual report. Conagra Brands uses this process to support prioritization of materials and inform the policies needed to mitigate risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies. This information is critical to Conagra Brands' understanding of supplier action to mitigate climate change, which is a contributing factor to deforestation - and vice versa. Supplier action to mitigate climate change helps mitigate negative agricultural impacts, which threaten our ability to procure ingredients and materials to make products. We rate suppliers within our Supplier Excellence program on sustainability performance, based on a review of annual sustainability reports and related documents and supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP climate change and forestry questionnaires, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry, including climate change and deforestation.

Impact on water security

Relevance & inclusion

Relevant, always included

Please explain

Water scarcity was identified as a critical topic for Conagra Brands in our company-wide materiality assessment, and water-change related issues are included as factors in our responsible sourcing risk assessment process that is completed for key commodities. It is also a topic noted as a business risk in our SEC filings and annual report. Conagra Brands uses this process to support prioritization of materials and inform the policies needed to mitigate risks. Ultimately, we will use this information to develop commodity-specific responsible sourcing goals and/or procurement policies. This information is critical to Conagra Brands' understanding of supplier action to mitigate water availability risks, which is a contributing factor to ecosystem stability and healthy forests. Supplier action to mitigate water risks helps mitigate negative agricultural impacts, which threaten our ability to procure ingredients and materials to make products. We rate suppliers within our Supplier Excellence program on sustainability performance, based on a review of annual sustainability reports and related documents and supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP water and forestry questionnaires, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry, including water risk and deforestation.

Tariffs or price increases

Relevance & inclusion

Relevant, always included

Please explain

This information is critical to Conagra Brands' understanding our suppliers' ability to provide required quantities of a commodity on a consistent basis. Commodity price impacts our production costs, which in turn can impact product price, business relationships and market share. Dedicated Conagra Brands procurement staff at the manager, director, senior director levels conduct ongoing monitoring of market prices. Risks prompt a procurement review of our supplier base and opportunities for diversification, in coordination with the sustainability team when needed. Procurement and R&D sustainability experts at Conagra Brands evaluate the role of price increases on our ability to provide products in line with our sustainable sourcing commitments at a reasonable price to consumers, and the team collectively develops an action plan.

Loss of markets

Relevance & inclusion

Relevant, always included

Please explain

This information is critical to understanding our suppliers' ability to provide required quantities of a commodity on a consistent basis. Market availability impacts our production costs and ability to produce products at quantity, which in turn can impact price, business relationships and market share. Dedicated Conagra Brands procurement staff at the manager, director, senior director levels conduct ongoing monitoring of supply availability. Tools Conagra Brands implements include USDA World Agricultural Supply and Demand Estimates (WASDE), and tailored analyses by experts in academia and industry with deep knowledge of commodity plantings, yields and other information related to maximizing supply. Risks prompt a procurement review of our supplier base and opportunities for diversification.

Leakage markets

Relevance & inclusion

Relevant, always included

Please explain

The possibility of leakage markets is an important factor in Conagra's approach to understanding and managing deforestation risk when sourcing high forest-risk ingredients, as this could have an impact on brand reputation and investor and consumer perceptions. Conagra has established commitments and policies, including our Supplier Code of Conduct, that require sourcing from suppliers with NDPE-compliant practices, third-party certifications, and/or suppliers in regions at low risk for deforestation. Our risk management team monitors our entire supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance, and all suppliers are evaluated quarterly for compliance with our Code of Conduct. By committing to source from NDPE-compliant sources, such as through sourcing 100% RSPO certified palm oil, we are working to address the impact of leakage markets by increasing demand for certified sustainable products.

Brand damage related to forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

This information is critical to Conagra Brands understanding of reputational risks that might manifest within our value chain. Conflicts can generate negative media and consumer campaigns against the company, and impact investor confidence/share price, license to operate in communities where we have facilities, and consumer/customer demand for our products. Our risk management team monitors our entire supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance. A Conagra Brands communications manager who is focused on corporate reputational issues, social and environmental sustainability provides ongoing monitoring of traditional and social media and guidance of conflicts that impact our brands. This individual coordinates closely with Conagra Brands' risk management, procurement and sustainability staff at the manager, senior manager, and senior director level to address risks and issues as they arise.

Corruption

Relevance & inclusion

Relevant, always included

Please explain

This information is critical to Conagra Brands understanding of risks that might manifest within our value chain. Corruption impacts within our operations and supply chain can threaten license to operate and talent attraction and retention, generate negative media and consumer campaigns against the company, impact investor confidence/share price and consumer/customer demand for our products. Conagra Brands' corporate Code of Conduct and Supplier Code of Conduct require ongoing documented compliance with ethics standards, and our suppliers confirm compliance with the Foreign Corrupt Practices Act. Conagra Brands and suppliers may not participate in or permit any forms of corruption, bribery, extortion, or embezzlement. Conagra Brands' senior leaders undergo a detailed anti-corruption training. Conagra Brands legal and human resources teams facilitate internal compliance mechanisms with confidential reporting channels for grievances. Conagra Brands' Supplier Code of Conduct requires ethical dealings by all our suppliers. Dedicated Conagra Brands procurement staff maintain regular communications with each commodity supplier to ensure compliance. Our risk management team monitors our entire supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance. Conagra Brands addresses any issues that may arise directly with the supplier and attempts to mediate concerns and maintain a steady supplier base. In any cases where issues cannot be satisfactorily resolved, the company would consider other supplier options.

Social impacts

Relevance & inclusion

Relevant, always included

Please explain

This information is critical to Conagra Brands understanding of reputational risks that might manifest within our value chain. Social impacts within our operations and supply chain can threaten license to operate and talent attraction and retention, generate negative media and consumer campaigns against the company, impact investor confidence/share price and consumer/customer demand for our products. Conagra Brands' corporate Code of Conduct and Supplier Code of Conduct require ongoing documented compliance with all applicable regulations addressing employee and communities. Conagra Brands and suppliers may not participate in or permit any forms of corruption, bribery, extortion, or embezzlement. Our risk management team monitors our entire supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance. Conagra Brands legal and human resources teams facilitate internal compliance mechanisms with confidential reporting channels for grievances. Dedicated Conagra Brands procurement staff maintain regular communications with each commodity supplier to ensure compliance. Conagra Brands addresses any issues that may arise directly with the supplier and attempts to mediate concerns and maintain a steady supplier base. In any cases where issues cannot be satisfactorily resolved, the company would consider other supplier options. For commodities where we source from geographies at high risk for social impacts, such as Malaysian palm oil, we require suppliers to meet recognized third-party standards for environmental and social responsibility such as RSPO to address impacts not adequately covered by local regulations. A Conagra Brands communications manager who is focused on corporate reputational issues, social and environmental sustainability provides ongoing monitoring of traditional and social media and guidance of conflicts that impact our brands. This individual coordinates closely with Conagra Brands' risk management, procurement and sustainability staff at the manager, senior manager, and senior director level to address risks and issues as they arise.

Other, please specify

Relevance & inclusion

Relevant, always included

Please explain

Stakeholder conflicts concerning forest risk commodities: This information is critical to Conagra Brands understanding of reputational risks that might manifest within our value chain. Conflicts can generate negative media and consumer campaigns against the company, and impact investor confidence/share price, license to operate in communities where we have facilities, and consumer/customer demand for our products. Conagra Brands' senior director responsible for sustainability strategy, and its director of sustainable development maintain relationships with various external stakeholders such as trade associations, customers, suppliers, government and non-governmental organizations and regularly attend industry events and meetings where current and emerging issues of this type are addressed, such as the AMERIPEN annual meeting and the ongoing Consumer Brands Association (SBA) Sustainability Committee. Conagra Brands' Sr. director of sustainability leads our membership in RSPO. This includes regular communications about emerging issues of this type. A Conagra Brands representative attended the first meeting of the Roundtable on Sustainable Beef and we have been monitoring progress. Given our substantially lower use of beef compared to other players at that roundtable, we are not actively engaged in those discussions; however, are very much aligned in principle with having documented standards and certifications for beef using an approach similar to RSPO. We have had discussions with some customers and peer companies about interest in convening a Roundtable for Sustainable Soy and are aligned in principle with having documented standards and certifications for soy similar to RSPO. Given our sourcing of soy is limited to North America currently, Conagra Brands has opted to defer to companies with greater risk in their supply chain for soy products grown in areas of concern.

F2.1c

(F2.1c) Which of the following stakeholders are considered in your organization's forests-related risk assessments?

Customers

Relevance & inclusion

Relevant, always included

Please explain

We collaborate with customers meet any relevant sustainable sourcing requirements that address deforestation risks. We also support customer efforts to explore sustainable commodity use, such as participation in a customer sustainable palm oil summit with palm oil suppliers and manufacturers like Conagra Brands. Our role included advising on capacity and pricing changes needed to implement segregated palm oil in the value chain.

Employees

Relevance & inclusion

Relevant, sometimes included

Please explain

Conagra's corporate social responsibility (CSR) program is employee-driven and includes a cross-functional Responsible Sourcing committee comprised of procurement leadership, regulatory and legal affairs, commodity buyers, and sustainability staff. This group collectively reviews deforestation risks and management opportunities, and coordinates with our suppliers to monitor practices.

Investors

Relevance & inclusion

Relevant, always included

Please explain

We respond to investor inquiries regarding forests risks via written and verbal engagements, as well as public disclosures in our annual citizenship report and CDP to inform decision-making by interested investor parties. Our sustainability senior director, as well as manager have conducted investor calls regarding water, climate change and deforestation risks to inform investment decisions.

Local communities

Relevance & inclusion

Relevant, sometimes included

Please explain

As a consumer of palm, timber, soy and cattle commodities, Conagra Brands does not directly manage the forest risks associated with producing commodity supplies, though we include local community impacts in our annual responsible sourcing risk assessment of large-spend ingredients and materials. We require good community practices through our Supplier Code of Conduct, and delegate direct community coordination around forests risks to the suppliers operating in communities impacted by forest practices. Conagra's sustainability staff addresses community concerns that are brought to our attention around deforestation, and through our supplier dialogues, we have integrated community concerns into company-wide deforestation-related procurement practices, and supplier ratings as part of the Supplier Excellence Program.

NGOs

Relevance & inclusion

Relevant, always included

Please explain

We respond to NGO inquiries regarding forests risks via written and verbal engagements, as well as public disclosures in our annual citizenship report and CDP to inform decision-making by interested investor parties. Our sustainability senior director and specialist have conducted phone calls and submitted written information to NGO representatives on Conagra Brands' goals, practices and progress managing water, climate change and deforestation risks, informing Conagra Brands' profile in NGO rankings and reports addressing these topics.

Other forest risk commodity users/producers at a local level

Relevance & inclusion

Relevant, always included

Please explain

As a consumer of palm, timber, soy and cattle commodities, Conagra Brands does not directly manage the forest risks associated with producing commodity supplies outside of our value chain, though we include local impacts in our annual responsible sourcing risk assessment of large-spend ingredients and materials. In addition, in select instances, our engagement around sustainable sourcing (e.g. via AMERIPEN and RSPO) brings us in collaboration with other forest risk commodity users/producers as part of industry-wide efforts to improve sustainability. All our suppliers for palm oil, soy, and beef have smallholder engagements that include sustainable agriculture training, sustainable forestry incentives, anti-deforestation guidelines, and/or fair-trade practices that support smallholder access to markets.

Regulators

Relevance & inclusion

Relevant, always included

Please explain

Conagra Brands' Washington, DC-based government affairs staff person regularly updates our senior director responsible for sustainability strategy on state and federal US legislation related to sustainable commodity sourcing, as well as international legislation that may impact our sourcing. Proposed changes in regulation that may impact our business prompt cross-functional meetings between procurement, sustainability, legal and other relevant teams within Conagra Brands to develop a tailored response strategy. Conagra Brands' senior director responsible for sustainability strategy maintains industry relationships with packaging organizations such as AMERIPEN that include regular meetings and communications about emerging regulation. Conagra Brands was a founding member and a representative previously served as an officer of the Board. We use our RSPO membership and supplier dialogues through our procurement team to continuously monitor for proposed changes in regulation impacting our supply chain.

Suppliers

Relevance & inclusion

Relevant, always included

Please explain

We rate palm, oil, beef and paper fiber suppliers on sustainability performance, based on a review of annual sustainability reports and related documents as part of our Supplier Excellence program, and this supplemented by a quarterly risk review for violations of our Code of Conduct. We deem suppliers that score a 0 out of 4 on sustainability in our Supplier Excellence Program to be high-risk from a sustainability perspective. Low-risk suppliers are defined as those having a B-level or higher public response to the CDP forestry questionnaire, audited GRI-compliant reporting, and policies adequately addressing sustainability risks specific to the supplier's industry such as deforestation. All suppliers – within the Supplier Excellence program and outside of it - are required to comply with our Supplier Code of Conduct. The Code states: suppliers will act in an environmentally responsible manner. At minimum, this means suppliers who follow applicable environmental laws and regulations, and who have the commitment as well as the ability to remediate any environmental problems they may cause. This includes compliance with regulations related to managing deforestation. Our procurement team maintains continuous communication with direct suppliers via monthly calls and other touchpoints to discuss any issues. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our purchases of commodities are managed by a dedicated procurement officer who conducts ongoing sustainability and deforestation issues tracking via news sources. For example, in recent years, this tracking identified emerging deforestation issues with a supplier being targeted by NGO campaigns. We subsequently met with the supplier's sustainability manager and were able to gather adequate information about how deforestation risks were being measured and mitigated.

Other stakeholders, please specify

Relevance & inclusion

Relevant, always included

Please explain

Consumer purchase behavior and preferences for responsibly sourced forest commodities is included by our demand sciences and R&D teams as part of ongoing product development and sourcing decisions. Sales data for sustainable forestry product certifications on key commodities is analyzed at least annually. Consumer survey data relevant to deforestation is generally reviewed quarterly.

F3. Risks and opportunities

F3.1

(F3.1) Have you identified any inherent forests-related risks with the potential to have a substantive financial or strategic impact on your business?

	Risk identified?
Timber products	Yes
Palm oil	Yes
Cattle products	Yes
Soy	Yes
Other - Rubber	<Not Applicable>
Other - Cocoa	Yes
Other - Coffee	<Not Applicable>

F3.1a

(F3.1a) How does your organization define substantive financial or strategic impact on your business?

Our Enterprise Risk Management team considers substantive impacts to be changes that have the potential to prevent Conagra Brands from achieving its strategic objectives. Our definition of substantive financial impact varies per product line, business and brand, due to variations in input costs, margins and levels of priority in our strategic plan. For financial reporting purposes, Conagra Brands applies the U.S. Security and Exchange Commission's materiality principles, where substantive impacts are defined as those that affect more than 5% of company revenue or assets, either in our direct operations or supply chain. Conagra Brands discloses financial impacts in compliance with applicable regulations, and where a substantive financial impact was felt, it is disclosed in the corresponding CDP questionnaire sections.

F3.1b

(F3.1b) For your disclosed forest risk commodity(ies), provide details of risks identified with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Forest risk commodity

Timber products

Type of risk

Physical

Geographical scale

Country

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Changes in precipitation patterns

Primary potential impact

Supply chain disruption

Company-specific description

Our paper suppliers are impacted by U.S. flooding caused by extreme weather and exacerbated by climate change, and forest fires exacerbated by drought that have appeared with increasing frequency over the past few years. The impact of floods and forest fires to our business is dependent on the proximity of the natural disaster to the forests and facilities within our supply chain, and the extent to which damaged wood chips permeate the pulp and paper supply chain. For example, extreme weather events in 2019 caused interruptions in production at some paper mills in the southeast U.S.

Timeframe

1-3 years

Magnitude of potential impact

Medium-low

Likelihood

About as likely as not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact (currency)

0

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

The calculated additional financial impact is zero due to our diversified procurement strategy. As part of our regular risk management and procurement practices, Conagra works to qualify multiple suppliers with multiple geographic sourcing regions to mitigate this risk. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Primary response to risk

Engagement with suppliers

Description of response

Our procurement team leverages strong supplier relationships to procure high-quality commodities at price points that support our financial goals. The primary tools leveraged by Conagra Brands to identify, assess and respond to these risks include 1) WRI Aqueduct Water Risk Atlas – Food & Beverage weighting scheme 2) a Supplier Excellence Program sustainability assessment 3) in-house risk-mapping and 4) international media resources. As risks are identified, we work closely with suppliers towards resolution. 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). Risks are communicated to our R&D and procurement teams to influence relevant product design, manufacturing and transportation decisions. This process has been adequate to address any risks with a significant business impact. For example, this strategy successfully enabled uninterrupted supply of fiber products for Conagra Brands due to supply backups we had in place, even while some paper mills in the southeast U.S. shut down due to extreme weather events in 2019.

Cost of response

Explanation of cost of response

We do not segregate costs associated with this response strategy from other costs of doing business.

Forest risk commodity

Soy

Type of risk

Reputational and markets

Geographical scale

Country

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Shifts in consumer preference

Primary potential impact

Increased production costs

Company-specific description

The consumer trend of plant-based food and beverages in the U.S. is increasing demand for soy as a food input. The “food versus fuel” debate – where regulators, farmers, NGOs and scientists debate the utility of soy crops for biofuels versus human consumption, creates uncertainty in soy availability and prices that impacts our business. Green consumer lifestyle trends encourage soy consumption and municipal air emissions-related policies in the US drive demand for bio-based fuels, both of which pressure soy supplies and potentially increase production costs for food manufacturers.

Timeframe

1-3 years

Magnitude of potential impact

Medium-low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact (currency)

0

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

The calculated additional financial impact is zero due to our diversified product design strategy. As part of our regular risk management and procurement practices, Conagra works to identify multiple ingredients with similar functional properties that allow product formulation flexibility as needed to mitigate this risk. Our analysis concluded that a “0” dollar value is appropriate given our integrated business practices and data limitations.

Primary response to risk

Engagement with suppliers

Description of response

Our strategy is to source from suppliers who track market trends impacting their commodity, work to minimize their environmental footprint and responsibly manage forests within their supply chain. According to best available data, approximately 97% of our volume comes from suppliers assessed at least annually on ESG performance as part of our Supplier Excellence Program, which includes a quarterly assessment of sustainable practices and disclosure, as well as quarterly discussions with Conagra Brands’ procurement team regarding sustainability performance and improvement areas. Conagra Brands utilizes USDA World Agricultural Supply and Demand Estimates (WASDE) and analyses by experts in academia and industry with deep knowledge of commodity plantings, yields and other information related to maximizing supply. Conagra Brands reviews supplier business practices annually, including sustainability and ability to meet our business needs, and rates suppliers on a points-based system. In FY20, 100% of our soy was sourced from areas designated as low risk for deforestation, according to data from WWF Living Forests Report, Ceres Engage the Chain, and WRI Global Forest Watch Analysis. As risks are identified, we work closely with suppliers towards resolution. Risks are communicated to our R&D and procurement teams to influence relevant product design, manufacturing and transportation decisions. This process has been adequate to address any risks with a significant business impact.

Cost of response

Explanation of cost of response

Our procurement team leverages strong supplier relationships to procure high-quality commodities at price points that support our financial goals. Our supplier and sourcing choices encompass this response strategy, as well as metrics related to product design, ingredient and material quality, and economic factors. We do not segregate costs associated with this response strategy from other costs of doing business.

Forest risk commodity

Palm oil

Type of risk

Reputational and markets

Geographical scale

Country

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Increased stakeholder concern or negative stakeholder feedback

Primary potential impact

Brand damage

Company-specific description

The potential for unsustainable and unethical practices among palm producers and related community opposition and grievance procedures threaten the availability, stability of palm oil supply and price consistency, all of which are key to our business. The 2019 delisting of Indonesian palm producer and RSPO member Golden Agri-

Resources (GAR) from the Dow Jones Sustainability Index for alleged deforestation violations did not impact our supply base directly, but produced regional supply uncertainty that impacts the food industry.

Timeframe

4-6 years

Magnitude of potential impact

Medium

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact (currency)

0

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

Our mandatory supplier code of conduct, updated as of October 2019, requires all suppliers to reduce environmental impacts such as deforestation, greenhouse gas emissions, and waste generation; protect water resources through restorative or conservation efforts; support social needs in the communities in which it operates through philanthropic investment, diversity and inclusion, human rights practices; and support traceability efforts of goods and services throughout the supply chain. Conagra Brands expects that its suppliers will act in an environmentally and socially responsible manner. In addition, suppliers are required to comply with applicable laws and regulations, and have the commitment as well as the ability to remediate any problems they may cause. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Primary response to risk

Increased use of sustainably sourced materials

Description of response

Our strategy to mitigate deforestation risk and grow demand that spurs economic development of supply for sustainable palm oil, is to source 100% RSPO-certified sustainable palm oil from RSPO members. Our strategy also includes growing demand for further improvements to sustainable palm oil agricultural system stability and yields through additional sourcing requirements: no paraquat or pesticides listed by the Stockholm or Rotterdam Conventions, no purchases from protected ecosystems, and other environmental requirements. In addition, Conagra Brands utilizes USDA World Agricultural Supply and Demand Estimates (WASDE) and tailored analyses by experts in academia and industry with deep knowledge of commodity plantings, yields and other information related to maximizing supply. On a quarterly basis as part of our Supplier Excellence Program, Conagra Brands reviews supplier business practices, including sustainability and ability to deliver product to meet Conagra Brands' business needs, and rates suppliers on a points-based system. The scorecard is used as a starting point for dialogue about supply price, availability, and the sustainability topics most material to Conagra Brands. Risks are communicated to our R&D and procurement teams to influence relevant product design, manufacturing and transportation decisions. As risks are identified, we work closely with suppliers towards resolution. This process has been adequate to address any risks with a significant business impact.

Cost of response

Explanation of cost of response

Our procurement team leverages strong supplier relationships to procure high-quality commodities at price points that support our financial goals. We address premiums associated with sustainably certified palm oil as part of product planning and customer discussions, and work with our marketing teams to communicate brand value of premium ingredients to the consumers who value them.

Forest risk commodity

Cattle products

Type of risk

Reputational and markets

Geographical scale

Country

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Local community opposition

Primary potential impact

Brand damage

Company-specific description

Our beef supply includes sources in Latin America, where there is heightened community awareness of the role of beef in deforestation. We expect interest in sustainably and ethically sourced beef to continue among investors and other stakeholders. Actions taken against our suppliers by local or global NGOs can lead to price, availability or reputational impacts for Conagra Brands, such as a 2017-18 anti-corruption campaign and government fines levied against one of our beef suppliers. The primary tools leveraged by Conagra Brands to identify, assess and respond to these risks include a Supplier Excellence Program assessment and media resources.

Timeframe

1-3 years

Magnitude of potential impact

Medium

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact (currency)

0

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

Our mandatory supplier code of conduct, updated as of October 2019, requires all suppliers to reduce environmental impacts such as deforestation, greenhouse gas emissions, and waste generation; protect water resources through restorative or conservation efforts; support social needs in the communities in which it operates through philanthropic investment, diversity and inclusion, human rights practices; and support traceability efforts of goods and services throughout the supply chain. Conagra Brands expects that its suppliers will act in an environmentally and socially responsible manner. In addition, suppliers are required to comply with applicable laws and regulations, and have the commitment as well as the ability to remediate any problems they may cause. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Primary response to risk

Engagement with suppliers

Description of response

Our strategy is to source from suppliers who work to minimize their environmental footprint and responsibly manage forests within their supply chain. Our major beef suppliers participate in the US Roundtable on Sustainable Beef, and one of our core suppliers has identified land management as one of its top three material issues. This supplier applies an environmental management system (EMS) that identifies the environmental impacts of its business, establishes targets and procedures to limit impacts, and provides staff with tools and processes to support environmental protection goals. Conagra Brands utilizes USDA World Agricultural Supply and Demand Estimates (WASDE) and tailored analyses by experts in academia and industry with deep knowledge of commodity forecasts, harvest and other information related to maximizing supply. On a quarterly basis as part of our Supplier Excellence Program, Conagra Brands reviews supplier business practices, including sustainability and known Code of Conduct violations, and rates suppliers on a points-based system. As risks are identified, we work closely with suppliers towards resolution. Risks are communicated to our R&D and procurement teams to influence relevant product design, manufacturing and transportation decisions. This process has been adequate to address any risks with a significant business impact.

Cost of response**Explanation of cost of response**

Our procurement team leverages strong supplier relationships to procure high-quality commodities at price points that support our financial goals. Our supplier and sourcing choices encompass this response strategy, as well as metrics related to product design, ingredient and material quality, and economic factors. We do not segregate costs associated with this response strategy from other costs of doing business.

Forest risk commodity

Other - Cocoa

Type of risk

Reputational and markets

Geographical scale

Country

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Increased stakeholder concern or negative stakeholder feedback

Primary potential impact

Brand damage

Company-specific description

Public awareness of the role cocoa production plays in deforestation in West Africa and other countries increased in 2019, as a result of A Global Forest Watch report that revealed the Ivory Coast as having the second highest increase in deforestation rates in the world and coverage of that report in media outlets such as The Guardian. Conagra Brands received at least one comment regarding deforestation risks on Twitter in 2019, which may have been as a result of increased media scrutiny on deforestation in supply chains. Without sustainable cocoa sourcing efforts in place, Conagra Brands would be at risk for increased consumer advocacy and reputational damage associated with its Swiss Miss cocoa brand.

Timeframe

1-3 years

Magnitude of potential impact

Medium-low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact (currency)

0

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

Our mandatory supplier code of conduct, updated as of October 2019, requires all suppliers to reduce environmental impacts such as deforestation, greenhouse gas emissions, and waste generation; protect water resources through restorative or conservation efforts; support social needs in the communities in which it operates through philanthropic investment, diversity and inclusion, human rights practices; and support traceability efforts of goods and services throughout the supply chain. Conagra

Brands expects that its suppliers will act in an environmentally and socially responsible manner. In addition, suppliers are required to comply with applicable laws and regulations, and have the commitment as well as the ability to remediate any problems they may cause. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Primary response to risk

Engagement with suppliers

Description of response

Our strategy is to source from suppliers who work to minimize their environmental footprint and responsibly manage forests within their supply chain. On a quarterly basis as part of our Supplier Excellence Program, Conagra Brands reviews supplier business practices, including sustainability and known Code of Conduct violations, and rates suppliers on a points-based system. According to best available data, 100% of total volume is sourced from suppliers that have one or more of the following: Rainforest Alliance Chain of Custody certification; NDPE policy (No high value conservation deforestation, no peatlands development, and no labor exploitation); 2025 or 2030 Zero Deforestation goals. As risks are identified, we work closely with suppliers towards resolution. Risks are communicated to our R&D and procurement teams to influence relevant product design, manufacturing and transportation decisions. This process has been adequate to address any risks with a significant business impact.

Cost of response

Explanation of cost of response

Our procurement team leverages strong supplier relationships to procure high-quality commodities at price points that support our financial goals. Our supplier and sourcing choices encompass this response strategy, as well as metrics related to product design, ingredient and material quality, and economic factors. We do not segregate costs associated with this response strategy from other costs of doing business.

F3.2

(F3.2) Have you identified any forests-related opportunities with the potential to have a substantive financial or strategic impact on your business?

	Have you identified opportunities?
Timber products	Yes
Palm oil	Yes
Cattle products	Yes
Soy	Yes
Other - Rubber	<Not Applicable>
Other - Cocoa	Yes
Other - Coffee	<Not Applicable>

F3.2a

(F3.2a) For your selected forest risk commodity(ies), provide details of the identified opportunities with the potential to have a substantive financial or strategic impact on your business.

Forest risk commodity

Timber products

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased brand value

Company-specific description & strategy to realize opportunity

Conagra Brands' folding carton and corrugate suppliers carry SFI or FSC certification, though not all products carry the certification logo on-pack due to space constraints, procurement contracts and on-pack communication priorities. Executing on the scale of this opportunity with on-pack labelling is considered on a product-by-product basis according to consumer priorities, regulatory labelling requirements, and specific contractual agreements with suppliers. As consumer demand for sustainable product attributes increases in the N. American market where we sell the majority of our products, on-pack sustainability certification for paper fiber packaging may become a higher business priority and has already been identified as a consideration for ongoing renovation of one of our frozen food brands. We conduct internal materiality analyses of sustainable sourcing of ingredients and packaging materials, including this commodity, to determine whether sustainable sourcing targets (via third-party certification or our own priority agricultural/sourcing criteria) are a business opportunity over the next few years. We have analyzed sustainable sourcing as a product purchase driver via consumer research, and our R&D teams incorporate sustainably sourced ingredients and materials into innovation planning based on consumer insights and brand priorities. As a result, Conagra added a third party fiber certification to an Evol brand frozen food product.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Medium

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Our internal analyses and recent consumer research suggest that consumers in the markets where we do business prefer to buy products with environmentally and socially responsible attributes, including those that address climate change, water scarcity and deforestation throughout their value chains (Hartman 2017). Approximately 50% of millennials, a target consumer per our business strategy, are willing to pay more for products with environmentally and/or socially responsible attributes (CSG 2018). The financial impact of these attribute opportunities for Conagra Brands are incorporated into SKU input costs, product margins and sales revenues, and we currently do not assign additional dollar values, based on demand science guidance that given currently available data, it is difficult to separate attribute monetary value from other consumer product purchase drivers such as quality and comparative price. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Forest risk commodity

Soy

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased brand value

Company-specific description & strategy to realize opportunity

Our short-term strategy is to continue to monitor stakeholder perspectives around sustainable soy while we evaluate credible, fact-based guidance on improving the sustainability of these commodities in our supply. Options to be evaluated include standards, sourcing goals, and collaborations with other organizations. As consumer demand for sustainable product attributes increases in the North American market where we sell most of our products, sustainable sourcing for this commodity may become a higher business priority. We conduct internal materiality analyses of sustainable sourcing of ingredients and packaging materials annually, including this commodity, to determine whether sustainable sourcing targets (via third-party certification or our own priority agricultural/sourcing criteria) are a business opportunity over the next few years. We have analyzed sustainable sourcing as a product purchase driver via consumer research, and our R&D teams incorporate sustainably sourced ingredients and materials into innovation planning based on consumer insights and brand priorities. As a result, we have added sustainable soy sourcing practices to sales materials about our products where soy is a major ingredient, such as Gardein meat replacements.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Our internal analyses and recent consumer research suggest that consumers in the markets where we do business prefer to buy products with environmentally and socially responsible attributes, including those that address climate change, water scarcity and deforestation throughout their value chains (Hartman 2017). Approximately 50% of millennials, a target consumer per our business strategy, are willing to pay more for products with environmentally and/or socially responsible attributes (CSG 2018). The financial impact of these attribute opportunities for Conagra Brands are incorporated into SKU input costs, product margins and sales revenues, and we currently do not assign additional dollar values, based on demand science guidance that given currently available data, it is difficult to separate attribute monetary value from other consumer product purchase drivers such as quality and comparative price. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Forest risk commodity

Palm oil

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased brand value

Company-specific description & strategy to realize opportunity

Corporate-level publications and disclosures are our primary strategy to realize brand value. Our annual GRI citizenship report includes reporting progress related to our goals on palm oil sourcing. We also submit our Annual Communication of Progress (ACOP) to RSPO each year. We will continue to evaluate opportunities to further promote sustainable palm sourcing on pack and/or on branded websites and communications as appropriate. As consumer demand for sustainable product attributes increases in the North American market where we sell most of our products, on-pack and marketing promotion of sustainable sourcing for this commodity may become a higher business priority. We conduct internal materiality analyses of sustainable sourcing of ingredients and packaging materials annually, including this commodity, to determine whether sustainable sourcing targets (via third-party certification or our own priority agricultural/sourcing criteria) are a business opportunity over the next few years. We have analyzed sustainable sourcing as a product purchase driver via consumer research, and our R&D teams incorporate sustainably sourced ingredients and materials into innovation planning based on consumer insights and brand priorities. As a result, we have included the RSPO logo with Mass Balance certification communications on packages of Earth Balance spreads.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Medium-low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Our internal analyses and recent consumer research suggest that consumers in the markets where we do business prefer to buy products with environmentally and socially responsible attributes, including those that address climate change, water scarcity and deforestation throughout their value chains (Hartman 2017). Approximately 50% of millennials, a target consumer per our business strategy, are willing to pay more for products with environmentally and/or socially responsible attributes (CSG 2018). The financial impact of these attribute opportunities for Conagra Brands are incorporated into SKU input costs, product margins and sales revenues, and we currently do not assign additional dollar values, based on demand science guidance that given currently available data, it is difficult to separate attribute monetary value from other consumer product purchase drivers such as quality and comparative price. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Forest risk commodity

Cattle products

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased brand value

Company-specific description & strategy to realize opportunity

Our short-term strategy is to continue to monitor stakeholder perspectives around sustainable beef while we evaluate credible, fact-based guidance on improving the sustainability of these commodities in our supply. Options to be evaluated include standards, sourcing goals, and collaborations with other organizations. As consumer demand for sustainable product attributes increases in the North American market where we sell most of our products, sustainable sourcing for this commodity may become a higher business priority. We conduct internal materiality analyses of sustainable sourcing of ingredients and packaging materials annually, including this commodity, to determine whether sustainable sourcing targets (via third-party certification or our own priority agricultural/sourcing criteria) are a business opportunity over the next few years. We have analyzed sustainable sourcing as a product purchase driver via consumer research, and our R&D teams incorporate sustainably sourced ingredients and materials into innovation planning based on consumer insights and brand priorities. As a result, we have evaluated sourcing options for certified sustainable beef production as part of a supplier pilot program in North America.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Medium

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Our internal analyses and recent consumer research suggest that consumers in the markets where we do business prefer to buy products with environmentally and socially responsible attributes, including those that address climate change, water scarcity and deforestation throughout their value chains (Hartman 2017). Approximately 50% of millennials, a target consumer per our business strategy, are willing to pay more for products with environmentally and/or socially responsible attributes (CSG 2018). The financial impact of these attribute opportunities for Conagra Brands are incorporated into SKU input costs, product margins and sales revenues, and we currently do not assign additional dollar values, based on demand science guidance that given currently available data, it is difficult to separate attribute monetary value from other consumer product purchase drivers such as quality and comparative price. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

Forest risk commodity

Other - Cocoa

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased brand value

Company-specific description & strategy to realize opportunity

Our short-term strategy is to continue to monitor stakeholder perspectives around sustainable cocoa while we evaluate credible, fact-based guidance on improving the sustainability of these commodities in our supply. Options to be evaluated include standards, sourcing goals, and collaborations with other organizations. As consumer demand for sustainable product attributes increases in the North American market where we sell most of our products, sustainable sourcing for this commodity may become a higher business priority. We conduct internal materiality analyses of sustainable sourcing of ingredients and packaging materials annually, including this commodity, to determine whether sustainable sourcing targets (via third-party certification or our own priority agricultural/sourcing criteria) are a business opportunity over the next few years. We have analyzed sustainable sourcing as a product purchase driver via consumer research, and our R&D teams incorporate sustainably sourced ingredients and materials into innovation planning based on consumer insights and brand priorities. As a result, we have assessed opportunities to source Fair Trade cocoa from suppliers with deforestation mitigation programs and presented options to one of our retail customers.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Our internal analyses and recent consumer research suggest that consumers in the markets where we do business prefer to buy products with environmentally and socially responsible attributes, including those that address climate change, water scarcity and deforestation throughout their value chains (Hartman 2017). Approximately 50% of millennials, a target consumer per our business strategy, are willing to pay more for products with environmentally and/or socially responsible attributes (CSG 2018). The financial impact of these attribute opportunities for Conagra Brands are incorporated into SKU input costs, product margins and sales revenues, and we currently do not assign additional dollar values, based on demand science guidance that given currently available data, it is difficult to separate attribute monetary value from other consumer product purchase drivers such as quality and comparative price. Our analysis concluded that a "0" dollar value is appropriate given our integrated business practices and data limitations.

F4. Governance

F4.1

(F4.1) Is there board-level oversight of forests-related issues within your organization?

Yes

F4.1a

(F4.1a) Identify the position(s) of the individual(s) (do not include any names) on the board with responsibility for forests-related issues.

Position of individual	Please explain
Board-level committee	Conagra Brands' materiality assessment noted deforestation as one of the material issues to be managed as part of our CSR and sustainability governance. The Conagra 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.

F4.1b

(F4.1b) Provide further details on the board's oversight of forests-related issues.

	Frequency that forests-related issues are a scheduled agenda item	Governance mechanisms into which forests-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. 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.

F4.2

(F4.2) Provide the highest management-level position(s) or committee(s) with responsibility for forests-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)	Responsibility	Frequency of reporting to the board on forests-related issues	Please explain
Chief Operating Officer (COO)	Both assessing and managing forests-related risks and opportunities	Annually	Together with the Chief Communications Officer and the Chief Human Resources Officer, the Chief Supply Chain Officer (Chief Operating Officer (COO) equivalent per CDP disclosure categorization) is the executive sponsor of the Corporate Social Responsibility (CSR) Cross-functional team and reports directly to the CEO. As an executive sponsor of the CSR Cross-functional team, the Chief Supply Chain Officer (Chief Operating Officer (COO) equivalent per CDP disclosure categorization) is informed on forests-related issues from subject matter experts within the company and serves as a champion for holistic sustainability issues and resources needed, including for forests topics and initiatives. The Chief Supply Chain Officer (Chief Operating Officer (COO) equivalent per CDP disclosure categorization) guides and approves CSR strategy, and facilitates updates to the Board and other leaders on climate and CSR issues.

F4.3

(F4.3) Do you provide incentives to C-suite employees or board members for the management of forests-related issues?

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

F4.4

(F4.4) Did your organization include information about its response to forests-related risks in its most recent mainstream financial report?

Yes (you may attach the report – this is optional)
conagra-annual-report-FY20.PDF

F4.5

(F4.5) Does your organization have a policy that includes forests-related issues?

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

F4.5a

(F4.5a) Select the options to describe the scope and content of your policy.

	Scope	Content	Please explain
Row 1	Company-wide	Commitments beyond regulatory compliance Recognition of the overall importance of forests and other natural ecosystems Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy List of timebound milestones and targets Description of forests-related performance standards for direct operations Other, please specify (Environmental responsibility and compliance)	100% of our suppliers are required to comply with our Supplier Code of Conduct, which was implemented prior to 2017 and remains in effect on a continuous basis into the foreseeable future. The Code states: suppliers will act in an environmentally responsible manner. At minimum, this means suppliers who follow applicable environmental laws and regulations and have the commitment as well as the ability to remediate any environmental problems they may cause. This includes compliance with regulations related to managing deforestation. Each requirement within our Code of Conduct must be absolutely and continuously met with documentation. Our procurement team maintains continuous communication with direct suppliers via monthly calls and other touchpoints to discuss any issues. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. At the highest level, governance for responsible sourcing is managed through our Supplier Code of Conduct, outlining the basic expectations for doing business with Conagra Brands. For products and regions where we source ingredients with high deforestation risks, we implement context-specific sourcing policies to minimize impacts, such as sourcing only certified product or avoiding high-risk geographies. When taking action on ingredient or packaging material specific issues, we take a collaborative approach, with our technical experts working hand-in-hand with category managers in Enterprise Procurement. We tailor our management approach to compliment the influence and relationships we have in our supply chain. For example, where we have direct relationships with suppliers, we work with each individually to enact change. In instances where we're managing responsible sourcing issues embedded further in our supply chain, we often leverage the expertise and influence of NGO or industry associations to drive change in the marketplace.

CONAGRA
 BRAND
 SUPPLIER
 CODE OF
 CONDUCT.pdf

F4.5b

(F4.5b) Do you have commodity specific sustainability policy(ies)? If yes, select the options that best describe their scope and content.

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Timber products	Yes	Company-wide	<p>Commitment to remediation, restoration and/or compensation of past harms</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>Description of forests-related standards for procurement</p>	<p>Conagra Brands relies on a sustainable supply of agricultural commodities to innovate and manufacture, which can be threatened by deforestation if over-harvested to meet industry needs. As such, our Supplier Code of Conduct for all suppliers and commodities includes: compliance with all applicable laws and regulations, including deforestation-related; respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; requires suppliers to address or remediate adverse human rights or environmental impacts linked to their operations or business activities; and reduce environmental impacts such as deforestation. Our zero deforestation and no conversion commitments are the intended result of commodity-specific geographic procurement prohibitions effective per our October 2019 Supplier Code of Conduct, which prohibits paper fiber directly sourced from areas at high risk for deforestation, specifically natural forests in Sumatra, Borneo, New Guinea, and the Russian Far East. Any paper fiber directly sourced from Indonesia, Malaysia, China, Thailand, or Colombia must have third-party sustainable forestry certification (e.g., SFI, FSC, PERC, Rainforest Alliance). The scope of our commitments are determined by supply chain-relevant geographies WWF has identified as high risk for forest loss by 2030 ("Saving Forests at Risk", 2015). Forest loss/deforestation and degradation are defined by WWF as conversion of forest to another land use or significant long-term reduction of tree canopy cover. WWF's report recommends Zero Net Deforestation and Forest Degradation (ZNDD) policies for these regions, defined as no net forest loss through deforestation and no net decline in forest quality through degradation, and recommends certified sustainable sourcing as one strategy to ZNDD. Our Supplier Code of Conduct was revised and reissued in October 2019 with policies intended to meet these goals. The Code of Conduct is reviewed every 2 years for alignment with current deforestation and sustainability risks. Our sustainability team reviews commodity-specific sustainability policies annually. The commodity-specific policies in our Code inform Procurement strategy for supplier engagement, risk assessments, and sourcing of forest-risk commodities.</p>
Palm oil	Yes	Company-wide	<p>Commitment to eliminate conversion of natural ecosystems</p> <p>Commitment to eliminate deforestation</p> <p>Commitment to remediation, restoration and/or compensation of past harms</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound commitments and targets</p> <p>Description of forests-related standards for procurement</p>	<p>Conagra Brands relies on a sustainable supply of agricultural commodities to innovate and manufacture, which can be threatened by deforestation if over-harvested to meet industry needs. We have a commitment to being a good corporate citizen through our focus areas on Better Planet, Good Food, Stronger Communities, and Responsible Sourcing. Our Supplier Code of Conduct includes policies on forest-risk commodities and supplier practices for the protection of the environment and human rights, including: compliance with all applicable laws and regulations, a commitment to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; a requirement to address or remediate adverse human rights or environmental impacts linked to their operations or business activities; and requirement to reduce environmental impacts such as deforestation and greenhouse gas emissions. The Code of Conduct is reviewed every 2 years for alignment with current deforestation and sustainability risks, and was updated in 2019 to include prohibitions on sourcing from specific high-risk deforestation regions. Our sustainability team reviews commodity-specific sustainability policies annually. The commodity-specific policies inform Procurement strategy for supplier engagement, risk assessments, and sourcing of forest-risk commodities. Conagra Brands has required all palm oil sourced to be RSPO certified sustainable since 2015, and in FY20 100% of our palm oil buy was covered by RSPO certification. Our commitment to source 100% RSPO palm oil eliminates natural ecosystem conversion, per the zero deforestation RSPO Principles and Criteria for Sustainable Palm Oil Production adopted in 2018. Our RSPO sourcing requirement is our mechanism for palm oil-specific time-bound commitments to eliminate deforestation and/or conversion, eliminate forests degradation and protect rights and livelihoods of local communities.</p>

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Cattle products	Yes	Company-wide	<p>Commitment to eliminate conversion of natural ecosystems</p> <p>Commitment to eliminate deforestation</p> <p>Commitment to remediation, restoration and/or compensation of past harms</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>Description of forests-related standards for procurement</p>	<p>Conagra Brands relies on a sustainable supply of agricultural commodities to innovate and manufacture, which can be threatened by deforestation if over-harvested to meet industry needs. As such, our Supplier Code of Conduct for all suppliers and commodities includes: compliance with all applicable laws and regulations, including deforestation-related; respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; requires suppliers to address or remediate adverse human rights or environmental impacts linked to their operations or business activities; and reduce environmental impacts such as deforestation. Our zero deforestation and no conversion commitments are the intended result of commodity-specific geographic procurement prohibitions effective per our October 2019 Supplier Code of Conduct, which prohibits beef sourced from areas at high risk for deforestation, specifically the Amazon, the Cerrado, the Gran Chaco in Latin America. The scope of our commitments are determined by supply chain-relevant geographies WWF has identified as high risk for forest loss by 2030 ("Saving Forests at Risk", 2015). Forest loss/deforestation and degradation are defined by WWF as conversion of forest to another land use or significant long-term reduction of tree canopy cover. WWF's report recommends Zero Net Deforestation and Forest Degradation (ZNDD) policies for these regions, defined as no net forest loss through deforestation and no net decline in forest quality through degradation, and recommends certified sustainable sourcing as one strategy to ZNDD. Our Supplier Code of Conduct was revised and reissued in October 2019 with policies intended to meet these goals. The Code of Conduct is reviewed every 2 years for alignment with current deforestation and sustainability risks. Our sustainability team reviews commodity-specific sustainability policies annually. The commodity-specific policies in our Code inform Procurement strategy for supplier engagement, risk assessments, and sourcing of forest-risk commodities.</p>
Soy	Yes	Company-wide	<p>Commitment to eliminate conversion of natural ecosystems</p> <p>Commitment to eliminate deforestation</p> <p>Commitment to remediation, restoration and/or compensation of past harms</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>Description of forests-related standards for procurement</p>	<p>Conagra Brands relies on a sustainable supply of agricultural commodities to innovate and manufacture, which can be threatened by deforestation if over-harvested to meet industry needs. As such, our Supplier Code of Conduct for all suppliers and commodities includes: compliance with all applicable laws and regulations, including deforestation-related; respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; requires suppliers to address or remediate adverse human rights or environmental impacts linked to their operations or business activities; and reduce environmental impacts such as deforestation. Our zero deforestation and no conversion commitments are the intended result of commodity-specific geographic procurement prohibitions effective per our October 2019 Supplier Code of Conduct, which prohibits soy sourced from areas at high risk for deforestation, specifically the Amazon, the Cerrado, the Gran Chaco in Latin America. Currently, 100% of our soy is sourced from the Midwest US, the lowest-rate deforestation region in the contiguous US (based on 1990-2000 percentage change in wildland-urban interface by region, US Forest Service 2010). The scope of our commitments are determined by supply chain-relevant geographies WWF has identified as high risk for forest loss by 2030 ("Saving Forests at Risk", 2015). Forest loss/deforestation and degradation are defined by WWF as conversion of forest to another land use or significant long-term reduction of tree canopy cover. WWF's report recommends Zero Net Deforestation and Forest Degradation (ZNDD) policies for these regions, defined as no net forest loss through deforestation and no net decline in forest quality through degradation, and recommends certified sustainable sourcing as one strategy to ZNDD. Our Supplier Code of Conduct was revised and reissued in October 2019 with policies intended to meet these goals. The Code of Conduct is reviewed every 2 years for alignment with current deforestation and sustainability risks. Our sustainability team reviews commodity-specific sustainability policies annually. The commodity-specific policies in our Code inform Procurement strategy for supplier engagement, risk assessments, and sourcing of forest-risk commodities.</p>
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
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Other - Cocoa	Yes	Company-wide	Commitment to remediation, restoration and/or compensation of past harms Commitment to protect rights and livelihoods of local communities Commitments beyond regulatory compliance Recognition of the overall importance of forests and other natural ecosystems Description of forests-related standards for procurement	Conagra Brands relies on a sustainable supply of agricultural commodities to innovate and manufacture, which can be threatened by deforestation if over-harvested to meet industry needs. In addition, we have a commitment to being a good corporate citizen through our focus areas on Better Planet, Good Food, Stronger Communities, and Responsible Sourcing. As such, our Supplier Code of Conduct includes policies related to forest-risk commodities and supplier practices for the protection of the environment and human rights, including: at minimum, compliance with all applicable laws and regulations, including deforestation-related regulation; a commitment to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; a requirement for suppliers to address or remediate adverse human rights or environmental impacts linked to their operations or business activities; and requirement to reduce environmental impacts such as deforestation and greenhouse gas emissions, among other impacts. The Code of Conduct is reviewed every 2 years for alignment with current deforestation and sustainability risks, and was most recently updated and republished in 2019. The policies in our Code inform Procurement strategy for supplier engagement, risk assessments, and sourcing of forest-risk commodities.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

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SUPPLIER
CODE OF
CONDUCT.pdf

F4.6

(F4.6) Has your organization made a public commitment to reduce or remove deforestation and/or forest degradation from its direct operations and/or supply chain?

Yes

F4.6a

(F4.6a) Has your organization endorsed any of the following initiatives as part of its public commitment to reduce or remove deforestation and/or forest degradation?

Other, please specify (Roundtable on Sustainable Palm Oil (RSPO))

F4.6b

(F4.6b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.

Forest risk commodity

Palm oil

Criteria

No conversion of natural ecosystems
No new development on peat regardless of depth
Avoidance of negative impacts on threatened and protected species and habitats
No trade of CITES listed species
No land clearance by burning or clearcutting
No conversion of High Conservation Value areas
No conversion of High Carbon Stock forests
Secure Free, Prior and Informed Consent (FPIC) of indigenous people and local communities
Promotion of gender equality and women's empowerment
Remediate any adverse impacts on indigenous people and local communities
Adoption of the UN International Labour Organization principles
Resolution of complaints and conflicts through an open, transparent and consultative process
Facilitate the inclusion of smallholders into the supply chain
No sourcing of illegally produced and/or traded forest risk commodities

No sourcing of forest risk commodities from unknown/controversial sources
Restricting the sourcing and/or trade of forest risk commodities to credible certified sources

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

2008

Commitment target date

2020

Please explain

Our Supplier Code of Conduct, mandating 100% compliance with all environmental laws and regulations (including no sourcing of illegally produced and/or traded forest risk commodities), was published in our 2008 Citizenship Report. Since 2015, Conagra Brands has required all palm oil sourced to be RSPO certified sustainable, with legacy Conagra Brands under an additional time-bound commitment to physically sourcing 100% RSPO-certified sustainable palm oil by 2020, with legacy Pinnacle Foods moving from sustainably sourced via RSPO certificates to sustainably sourced via RSPO mass balance as part of ongoing integration efforts. For example, in 2019 we moved legacy Pinnacle Foods' spreads brands such as Earth Balance from sustainably sourced via RSPO certificates to sustainably sourced via RSPO mass balance palm oil. The Deforestation section of our Supplier Code of Conduct states requires all suppliers to reduce 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, and human rights practices in accordance with 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. Suppliers must avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur and seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. The Code of Conduct requires suppliers to support traceability efforts of goods and services throughout the supply chain. At minimum, this means suppliers who follow applicable environmental laws and regulations, and who have the commitment as well as the ability to remediate any environmental problems they may cause. This includes compliance with regulations related to managing deforestation.

Forest risk commodity

Soy

Criteria

Remediate any adverse impacts on indigenous people and local communities
Adoption of the UN International Labour Organization principles
No sourcing of illegally produced and/or traded forest risk commodities
No sourcing of forest risk commodities from unknown/controversial sources

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

2008

Commitment target date

<2017

Please explain

Our Supplier Code of Conduct updated in October 2019 mandates 100% compliance with all environmental laws and regulations (including no sourcing of illegally produced and/or traded forest risk commodities) for all suppliers. Additionally, the Code commits to not sourcing soy from areas at risk for deforestation, specifically the Amazon, the Cerrado, and the Gran Chaco in Latin America. For example, in 2019 we conducted a review of supplier sourcing regions in order to confirm that no sourcing was taking place in high risk geographies. The Deforestation section of our Supplier Code of Conduct states requires all suppliers to reduce 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, and human rights practices in accordance with 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. Suppliers must avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur and seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. The Code of Conduct requires suppliers to support traceability efforts of goods and services throughout the supply chain. At minimum, this means suppliers who follow applicable environmental laws and regulations, and who have the commitment as well as the ability to remediate any environmental problems they may cause. This includes compliance with regulations related to managing deforestation.

Forest risk commodity

Cattle products

Criteria

No sourcing of illegally produced and/or traded forest risk commodities

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

2008

Commitment target date

<2017

Please explain

Our Supplier Code of Conduct updated in October 2019 mandates 100% compliance with all environmental laws and regulations (including no sourcing of illegally produced and/or traded forest risk commodities) for all suppliers. Additionally, the Code commits to not sourcing beef from areas at risk for deforestation, specifically the Amazon, the

Cerrado, and the Gran Chaco in Latin America. For example, in 2019 we conducted a review of supplier sourcing regions in order to confirm that no sourcing was taking place in high risk geographies. The Deforestation section of our Supplier Code of Conduct states requires all suppliers to reduce 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, and human rights practices in accordance with 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. Suppliers must avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur and seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. The Code of Conduct requires suppliers to support traceability efforts of goods and services throughout the supply chain. At minimum, this means suppliers who follow applicable environmental laws and regulations, and who have the commitment as well as the ability to remediate any environmental problems they may cause. This includes compliance with regulations related to managing deforestation.

Forest risk commodity

Timber products

Criteria

No sourcing of illegally produced and/or traded forest risk commodities

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

2008

Commitment target date

<2017

Please explain

Our Supplier Code of Conduct mandates 100% compliance with all environmental laws and regulations (including no sourcing of illegally produced and/or traded forest risk commodities) for all suppliers. Additionally, the Code commits to not sourcing paper fiber from areas at risk for deforestation, specifically natural forests in Sumatra, Borneo, New Guinea, and the Russian Far East. Our procurement policy also requires that paper fiber directly sourced from Indonesia, Malaysia, China, Thailand, or Colombia have third-party sustainable forestry certification (e.g., SFI, FSC, PERC, Rainforest Alliance). For example, in 2019 we conducted a review of supplier sourcing regions in order to confirm that no sourcing was taking place in high risk geographies. The Deforestation section of our Supplier Code of Conduct states requires all suppliers to reduce 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, and human rights practices in accordance with 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. Suppliers must avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur and seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. The Code of Conduct requires suppliers to support traceability efforts of goods and services throughout the supply chain. At minimum, this means suppliers who follow applicable environmental laws and regulations, and who have the commitment as well as the ability to remediate any environmental problems they may cause. This includes compliance with regulations related to managing deforestation.

Forest risk commodity

Other - Cocoa

Criteria

Remediate any adverse impacts on indigenous people and local communities

Adoption of the UN International Labour Organization principles

No sourcing of illegally produced and/or traded forest risk commodities

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

2008

Commitment target date

<2017

Please explain

Our Supplier Code of Conduct updated in October 2019 mandates 100% compliance with all environmental laws and regulations (including no sourcing of illegally produced and/or traded forest risk commodities) for all suppliers. The Deforestation section of our Supplier Code of Conduct states requires all suppliers to reduce 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, and human rights practices in accordance with 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. Suppliers must avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur and seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. The Code of Conduct requires suppliers to support traceability efforts of goods and services throughout the supply chain. At minimum, this means suppliers who follow applicable environmental laws and regulations, and who have the commitment as well as the ability to remediate any environmental problems they may cause. This includes compliance with regulations related to managing deforestation. Each requirement within our Code of Conduct must be absolutely and continuously met with documentation. Our procurement team maintains continuous communication with direct suppliers via monthly calls and other touchpoints to discuss any issues. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our purchases of commodities are managed by a dedicated procurement officer who conducts ongoing sustainability and deforestation issues tracking via news sources.

F5.1

(F5.1) Are forests-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are forests-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, forests-related issues are integrated	11-15	Healthy ecosystems that mitigate deforestation are essential to how we prepare food and critical to the farmers that grow our raw ingredients, which makes forests-related issues in our supply chain important components of our long-term business objectives. Conagra's R&D sustainability team reviews academic, peer-reviewed, and government research throughout the year that addresses potential environmental impacts on global agriculture yields, ingredient and packaging material supply chains to identify sourcing risks and opportunities related to deforestation and other risks that may impact ability to access materials to make our products (and thus potentially have a substantive financial or strategic impact) through 2080, based on best available science. Based on this research, Conagra updates an internal Sustainably Advantaged ingredient and materials list for our R&D organization to inform product development throughout the year. For example, we are increasing portfolio offerings of lower deforestation-risk plant proteins (e.g. US-produced soy in Gardein meat alternative products) as part of our ongoing efforts to meet consumer demand for more sustainable diets.
Strategy for long-term objectives	Yes, forests-related issues are integrated	11-15	Sustainable sourcing is a strategy to meet long-term objectives of a higher-value portfolio and channel distribution growth. Conagra's R&D sustainability team reviews academic, peer-reviewed, and government research throughout the year that addresses potential environmental impacts on global agriculture yields, ingredient and packaging material supply chains to identify sourcing risks and opportunities related to deforestation and other risks that may impact ability to access materials to make our products (and thus potentially have a substantive financial or strategic impact) through 2080, based on best available science. For example, our long-term strategy for palm oil sourcing is to continue utilizing RSPO certified palm oil in accordance with their deforestation prohibitions for that commodity.
Financial planning	Yes, forests-related issues are integrated	11-15	Sustainable sourcing is a strategy to meet long-term objectives of a higher-value portfolio and channel distribution growth. Conagra's R&D sustainability team reviews academic, peer-reviewed, and government research throughout the year that addresses potential environmental impacts on global agriculture yields, ingredient and packaging material supply chains to identify sourcing risks and opportunities related to deforestation and other risks that may impact ability to access materials to make our products (and thus potentially have a substantive financial or strategic impact) through 2080, based on best available science. Financial planning for product premiumization includes, in some cases, increasing the proportion of plant proteins relative to animal protein sources – such as beef, which is a high-deforestation risk commodity – in Conagra Brands' portfolio as part of our ongoing efforts to promote adoption of sustainable diets in the markets we serve. For example, our acquisition of Pinnacle Foods' Gardein meat replacement products and Earth Balance vegan table spreads has expanded our plant-based business significantly.

F6. Implementation

F6.1

(F6.1) Did you have any timebound and quantifiable targets for increasing sustainable production and/or consumption of your disclosed commodity(ies) that were active during the reporting year?

Yes

F6.1a

(F6.1a) Provide details of your timebound and quantifiable target(s) for increasing sustainable production and/or consumption of the disclosed commodity(ies), and progress made.

Target reference number

Target 1

Forest risk commodity

Palm oil

Type of target

Third-party certification

Description of target

Source 100% certified sustainable palm oil by 2020

Linked commitment

No conversion of natural ecosystems

Traceability point

<Not Applicable>

Third-party certification scheme

RSPO Mass Balance
RSPO Book and Claim

Start year

2013

Target year

2020

Quantitative metric

<Not Applicable>

Target (number)

<Not Applicable>

Target (%)

100

% of target achieved

100

Please explain

100% of our palm oil buy in 2020 was covered by RSPO certification.

F6.2

(F6.2) Do you have traceability system(s) in place to track and monitor the origin of your disclosed commodity(ies)?

	Do you have system(s) in place?	Description of traceability system	Exclusions	Description of exclusion
Timber products	Yes	Our suppliers provide traceability data to the Forest Management Unit for all virgin paper. A dedicated Conagra Brands procurement manager coordinates with suppliers around specific geographies, and our suppliers send reports in writing in response to inquiries. We inquire directly with suppliers as issues arise and annually confirm country of origin per internal supplier quality requirements. As part of our Supplier Excellence Program, we conduct calls with each of our major paper fiber suppliers to track their individual certifications and methods of management. Suppliers with sustainability certifications, management practices and strong disclosures score favorably on our supplier sustainability scorecard. For example, we have traced our paper fiber supply to forests in the Southeast U.S., including Georgia, via supplier discussions and a review of major paper fiber production areas in the countries that we source.	Specific supplier(s)	Suppliers included are generally limited to the suppliers participating in our Supplier Excellence Program.
Palm oil	Yes	Our palm suppliers trace origins to the mill level for palm oil, and trace to the plantation level for palm kernel oil. A dedicated Conagra Brands procurement manager coordinates with suppliers around specific geographies, and our suppliers send reports in writing in response to inquiries. We inquire directly with suppliers as issues arise and annually confirm country of origin per internal supplier quality requirements. For example, we utilize a supplier's online dashboard to monitor progress tracing palm oil supply to the plantation. Data in this dashboard is updated quarterly and third party verified.	Specific supplier(s)	Suppliers included are generally limited to the suppliers participating in our Supplier Excellence Program.
Cattle products	Yes	Per USDA requirements, every box of beef we purchase includes an establishment number traceable to the slaughterhouse. We utilize USDA establishment numbers to identify the slaughterhouse source of sourced beef. A dedicated Conagra Brands procurement manager coordinates with suppliers around specific geographies, and our suppliers send reports in writing in response to inquiries. We inquire directly with suppliers as issues arise and annually confirm country of origin per internal supplier quality requirements, as well as Supplier Excellence Program beef supplier discussions about sustainability and ranch-level sustainability practices across a network of more than 32,000 US ranchers in our supply chain. For example, we have traced a portion of our beef supply to ranches in the Southwest U.S., including Texas, via supplier discussions and a review of major beef production areas in the countries that we source.	Specific supplier(s)	Suppliers included are generally limited to the suppliers participating in our Supplier Excellence Program.
Soy	Yes	Conagra Brands' SAP system allows us to track to each supplier batch, with our suppliers providing origin information. A dedicated Conagra Brands procurement manager coordinates with suppliers around specific geographies, and our suppliers send reports in writing in response to inquiries. We inquire directly with suppliers as issues arise and annually confirm country of origin per internal supplier quality requirements. Further traceability comes through our supply chain. Our suppliers provide traceability to an individual mill (refinery), which can provide agricultural geographic source information within a country, and gather additional information at the farm level when it is available. For example, we conducted a farm visit to an Illinois soybean farm that is a source for one of our suppliers to review sustainable farming practices.	Specific supplier(s)	Suppliers included are generally limited to the suppliers participating in our Supplier Excellence Program.
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes	We have traced our cocoa supply to producers in West Africa via supplier discussions and a review of major global cocoa production areas. Fifteen percent of our supply is traceable via suppliers with Rainforest Alliance Chain of Custody or Fairtrade Cocoa certification.	Specific supplier(s)	Suppliers included are generally limited to the suppliers participating in our Supplier Excellence Program.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.2a

(F6.2a) Provide details on the level of traceability your organization has for its disclosed commodity(ies).

Forest risk commodity	Point to which commodity is traceable	% of total production/consumption volume traceable
Timber products	Forest management unit	100
Palm oil	Mill	100
Cattle products	Slaughterhouse	100
Soy	Mill	100
Other - Cocoa	Country	80

F6.3

(F6.3) Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)?

	Third-party certification scheme adopted?	% of total production and/or consumption volume certified
Timber products	Yes	90
Palm oil	Yes	100
Cattle products	Yes	20
Soy	No, we have not adopted any third-party certification schemes for this commodity	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes	16
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.3a**(F6.3a) Provide a detailed breakdown of the volume and percentage of your production and/or consumption by certification scheme.****Forest risk commodity**

Timber products

Third-party certification scheme

FSC (any type)

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

90

Form of commodity

Primary packaging

Secondary packaging

Tertiary packaging

Volume of production/ consumption certified

242115

Metric for volume

Other, please specify (US Short tons)

Is this certified by more than one scheme?

No

Please explain

In the last year, we assessed approximately 98% of our paper fiber supply on third-party certification availability. Approximately 90% of virgin fiber for fiber-based packaging is sourced from suppliers utilizing Forest Stewardship Council (FSC) or Sustainable Forestry Initiative (SFI) certified mills, and we look to improve the percentage of supply with sustainability certifications over time as part of Conagra's Supplier Excellence Program. For example, our expanded use of paper fiber serving bowls for newly launched Banquet, Frontera, PF Chang and Healthy Choice frozen meals has increased the volume of paper fiber we source from N American suppliers with third-party sustainability certifications throughout their supply chains. In 2019, we updated the Conagra Brands Code of Conduct to prohibit sourcing paper fiber from areas at high risk for deforestation, specifically natural forests in Sumatra, Borneo, New Guinea, and the Russian Far East. To improve the paper recycling stream and increase the availability of recycled content paper fiber, we include the How2Recycle label on all Conagra Brands products sold in the U.S. as part of our packaging graphics refresh process. These percentages are estimates based on best available data from our suppliers and internal systems. In the last year, we have engaged with our Supplier Excellence program suppliers to measure their sustainability performance and confirm our timber-based packaging suppliers are meeting their sustainability objectives.

Forest risk commodity

Palm oil

Third-party certification scheme

RSPO Mass Balance

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

42

Form of commodity

Crude palm oil (CPO)

Refined palm oil

Palm oil derivatives

Palm kernel oil derivatives

Volume of production/ consumption certified

31253

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Since 2015, Conagra Brands has required all palm oil sourced to be RSPO certified sustainable, with legacy Conagra Brands under an additional time-bound commitment to physically sourcing 100% RSPO-certified sustainable palm oil by 2020, with legacy Pinnacle Foods moving from sustainably sourced via RSPO certificates to sustainably sourced via RSPO mass balance as part of ongoing integration efforts. For example, in 2019 we moved legacy Pinnacle Foods' spreads brands such as Earth

Balance from sustainably sourced via RSPO certificates to sustainable sourced via RSPO mass balance palm oil. In fiscal year 2020, 42% of sourced palm oil was certified to RSPO's Mass Balance standard and 58% was via RSPO certificates. In the last year, we have increased the percentage of RSPO Mass Balance palm oil we purchase and continued conversations with suppliers to support our efforts to transition to Mass Balance.

Forest risk commodity

Palm oil

Third-party certification scheme

RSPO Credits/Book & Claim

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

58

Form of commodity

Crude palm oil (CPO)

Refined palm oil

Palm oil derivatives

Palm kernel oil derivatives

Volume of production/ consumption certified

44416

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Since 2015, Conagra Brands has required all palm oil sourced to be RSPO certified sustainable, with legacy Conagra Brands under an additional time-bound commitment to physically sourcing 100% RSPO-certified sustainable palm oil by 2020, with legacy Pinnacle Foods moving from sustainably sourced via RSPO certificates to sustainably sourced via RSPO mass balance as part of ongoing integration efforts. For example, in 2019 we moved legacy Pinnacle Foods' spreads brands such as Earth Balance from sustainably sourced via RSPO certificates to sustainable sourced via RSPO mass balance palm oil. In fiscal year 2020, 42% of sourced palm oil was certified to RSPO's Mass Balance standard and 58% was via RSPO certificates. In the last year, we have continued to purchase RSPO credits as we work with our suppliers to transition to Mass Balance.

Forest risk commodity

Cattle products

Third-party certification scheme

Other, please specify (US Roundtable on Sustainable Beef Sustainability Framework)

Chain-of-custody model used

Not applicable

% of total production/consumption volume certified

20

Form of commodity

Beef

Volume of production/ consumption certified

44450703

Metric for volume

Other, please specify (lbs)

Is this certified by more than one scheme?

No

Please explain

More than 80% of our beef is sourced from areas designated as low risk for deforestation, according to data from WWF Living Forests Report, Ceres Engage the Chain, and WRI Global Forest Watch Analysis. In 2019, we updated the Conagra Brands Code of Conduct to prohibit procurement of beef from areas at high risk for deforestation, specifically the Amazon, the Cerrado and the Gran Chaco in Latin America, with satellite technology in place to monitor for deforestation. In the last year, we assessed approximately 70% of our volume for additional sustainable sourcing practices as part of Conagra's Supplier Excellence Program. Since last year's disclosure, we have been able to approximate 20% of our beef as sourced in accordance with the new US Roundtable on Sustainable Beef Sustainability Framework, which is an increase from the known previous volume. These percentages are estimates based on best available data from our suppliers and internal systems. In the past year, we have continued to source beef from suppliers participating in the US Roundtable on Sustainable Beef. Two of our beef suppliers now have programs adhering to the USRSB Framework, and our major suppliers all participate in the organization. We continuously work with beef suppliers in our Supplier Excellence Program to annually rate them on sustainability metrics and identify improvement opportunities. The USRSB provides sustainability frameworks and continuous improvement platform for beef producers and processors, but is not a chain of custody based standard so the chain of custody model is not applicable.

Forest risk commodity

Other - Cocoa

Third-party certification scheme

Other, please specify (Rainforest Alliance or Fairtrade Certified)

Chain-of-custody model used

Mass balance

% of total production/consumption volume certified

16

Form of commodity

Other, please specify (Cocoa powder and cocoa products)

Volume of production/ consumption certified

2826051

Metric for volume

Other, please specify (lbs)

Is this certified by more than one scheme?

No

Please explain

In the last year, we have increased the amount we source from suppliers with third party certifications for sustainable cocoa. These percentages are estimates based on best available data from our suppliers and internal systems. According to best available data, we have estimated that in FY20 approximately 16% of our cocoa supply was sourced from suppliers with Fairtrade and/or Rainforest Alliance certifications. According to best available data, 100% of our cocoa volume is sourced from suppliers that have one or more of the following: Rainforest Alliance Chain of Custody certification; NDPE policy (No high value conservation deforestation, no peatlands development, and no labor exploitation); 2025 or 2030 net zero deforestation goals that include reforestation and agroforestry efforts that support biodiversity.

F6.4

(F6.4) For your disclosed commodity(ies), do you have a system to control, monitor, or verify compliance with no conversion and/or no deforestation commitments?

	A system to control, monitor or verify compliance	Comment
Timber products	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Palm oil	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Cattle products	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Soy	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, we have a system in place, but for other commitments	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.4a

(F6.4a) Provide details on the system, the approaches used to monitor compliance, the quantitative progress, and the non-compliance protocols, to implement your no conversion and/or deforestation commitment(s).**Forest risk commodity**

Palm oil

Operational coverage

Supply chain

Description of control systems

Our palm oil supply comes from suppliers in good standing with RSPO, and organizations in the supply chain that use RSPO certified sustainable oil are third-party audited. A dedicated procurement officer conducts ongoing sustainability and deforestation issues tracking via news sources. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code of Conduct and require suppliers to replicate these standards down their supply chains. 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. Our risk management team monitors our supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance, with 0 incidents of non-compliance found related to environmental compliance, child labor and human trafficking.

Monitoring and verification approach

Geospatial monitoring tool

Third-party verification

Other, please specify (Scorecard and Code of Conduct monitoring)

% of total volume in compliance

Please select

% of total suppliers in compliance

Please select

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Providing information on appropriate actions that can be taken to address non-compliance

Please explain

We conduct an annual review of our key palm oil suppliers verified and traceable sourcing of RSPO certified palm oil and the certified volumes we procure. Code of conduct compliance is monitored continuously, with monthly touchpoints between our procurement team and direct suppliers, and an annual supplier survey including questions on sustainability practices to key suppliers as part of our Supplier Excellence Program. Our response to non-compliance varies based on the severity/scale of the issue. If a non-compliance is discovered, we engage with suppliers to understand the issue and develop a case-by-case response to determine the appropriate course of action for the supplier to return to compliance.

Forest risk commodity

Timber products

Operational coverage

Supply chain

Description of control systems

Our Supplier Code of Conduct prohibits paper fiber sourced from areas at high risk for deforestation, specifically natural forests in Sumatra, Borneo, New Guinea, and the Russian Far East. Paper fiber sourced from Indonesia, Malaysia, China, Thailand, or Colombia is required to have third-party verification for low deforestation risk. We maintain the right to inspect production facilities or review the applicable documentation to ensure compliance with our Code of Conduct. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our risk management team monitors our supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance, with 0 incidents of non-compliance found related to environmental compliance, child labor and human trafficking.

Monitoring and verification approach

Third-party verification

Other, please specify (Scorecard and Code of Conduct monitoring)

% of total volume in compliance

Please select

% of total suppliers in compliance

Please select

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Providing information on appropriate actions that can be taken to address non-compliance

Please explain

We conduct an annual assessment of the percentage of third-party verified paper sourcing from our suppliers. Code of conduct compliance is monitored continuously, with monthly touchpoints between our procurement team and direct suppliers, and an annual supplier survey including questions on sustainability practices to key suppliers as part of our Supplier Excellence Program. Our response to non-compliance varies based on the severity/scale of the issue. If a non-compliance is discovered, we engage with suppliers to understand the issue and develop a case-by-case response to determine the appropriate course of action for the supplier to return to compliance.

Forest risk commodity

Cattle Products

Operational coverage

Supply chain

Description of control systems

Our Supplier Code of Conduct prohibits beef sourced from areas at high risk for deforestation, specifically the Amazon, the Cerrado, the Gran Chaco in Latin America, with satellite technology in place to monitor for deforestation. All suppliers are required to comply with our Supplier Code of Conduct, which requires compliance with applicable regulations including those related to managing deforestation. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code of Conduct. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our risk management team monitors our supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance, with 0 incidents of non-compliance found related to environmental compliance, child labor and human trafficking.

Monitoring and verification approach

Geospatial monitoring tool

Other, please specify (Scorecard and Code of Conduct monitoring)

% of total volume in compliance

Please select

% of total suppliers in compliance

Please select

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Providing information on appropriate actions that can be taken to address non-compliance

Please explain

Code of conduct compliance is monitored continuously, with monthly touchpoints between our procurement team and direct suppliers, and an annual supplier survey including questions on sustainability practices to key suppliers as part of our Supplier Excellence Program. Our response to non-compliance varies based on the severity/scale of the issue. If a non-compliance is discovered, we engage with suppliers to understand the issue and develop a case-by-case response to determine the appropriate course of action for the supplier to return to compliance.

Forest risk commodity

Soy

Operational coverage

Supply chain

Description of control systems

Our Supplier Code of Conduct prohibits beef sourced from areas at high risk for deforestation, specifically the Amazon, the Cerrado, the Gran Chaco in Latin America, with satellite technology in place to monitor for deforestation. All suppliers are required to comply with our Supplier Code of Conduct, which requires compliance with applicable regulations including those related to managing deforestation. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code of Conduct. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our risk management team monitors our supplier list daily for regulatory violations and legal actions, including those on regulatory corruption, social and environmental compliance, with 0 incidents of non-compliance found related to environmental compliance, child labor and human trafficking.

Monitoring and verification approach

Ground-based monitoring system

Other, please specify (Scorecard and Code of Conduct monitoring)

% of total volume in compliance

Please select

% of total suppliers in compliance

Please select

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Providing information on appropriate actions that can be taken to address non-compliance

Please explain

Code of conduct compliance is monitored continuously, with monthly touchpoints between our procurement team and direct suppliers, and an annual supplier survey including questions on sustainability practices to key suppliers as part of our Supplier Excellence Program. Our response to non-compliance varies based on the severity/scale of the issue. If a non-compliance is discovered, we engage with suppliers to understand the issue and develop a case-by-case response to determine the appropriate course of action for the supplier to return to compliance.

F6.6

(F6.6) For your disclosed commodity(ies), indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards.

	Assess legal compliance with forest regulations	Comment
Timber products	<Not Applicable>	<Not Applicable>
Palm oil	Yes, from suppliers	<Not Applicable>
Cattle products	Yes, from suppliers	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, from suppliers	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.6a

(F6.6a) For you disclosed commodity(ies), indicate how you ensure legal compliance with forest regulations and/or mandatory standards.

Palm oil**Procedure to ensure legal compliance**

All suppliers are required to comply with our Supplier Code of Conduct, which requires compliance with applicable regulations including those related to managing deforestation. Our procurement team maintains continuous communication with direct suppliers via monthly calls and other touchpoints to discuss any issues. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code of Conduct. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our Supplier Quality and Risk teams 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. Our Risk team's due diligence screens specifically include criteria related to environmental compliance. In addition, Conagra Brands' Legal and Human Resources teams facilitate internal compliance expectations in supplier operations, with confidential reporting channels for grievances. We feel the procedures are adequate to address sustainability risks due to the fact that the procedures apply to all Conagra suppliers, utilize continuous third party monitoring services, and engage a cross-functional team of experts across multiple Conagra functions to identify emerging compliance risks and apply appropriate expertise to mitigate. In addition, by exclusively sourcing palm oil from RSPO members, Conagra leverages the monitoring and compliance systems of the RSPO to ensure that our palm oil suppliers meet and exceed the standards in our Supplier Code of Conduct.

Country/Area of origin

Indonesia

Malaysia

Law and/or mandatory standard(s)

General assessment of legal compliance

Comment

Cattle products

Procedure to ensure legal compliance

All suppliers are required to comply with our Supplier Code of Conduct, which requires compliance with applicable regulations including those related to managing deforestation. Our procurement team maintains continuous communication with direct suppliers via monthly calls and other touchpoints to discuss any issues. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code of Conduct. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our Supplier Quality and Risk teams 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. Our Risk team's due diligence screens specifically include criteria related to environmental compliance. In addition, Conagra Brands' Legal and Human Resources teams facilitate internal compliance expectations in supplier operations, with confidential reporting channels for grievances. We feel the procedures are adequate to address sustainability risks due to the fact that the procedures apply to all Conagra suppliers, utilize continuous third party monitoring services, and engage a cross-functional team of experts across multiple Conagra functions to identify emerging compliance risks and apply appropriate expertise to mitigate. In addition, beef sourced from Latin America (e.g. Brazil) originates from producers and areas under continuous satellite monitoring for deforestation. Conagra reviews satellite imagery reports from any Latin American sourcing regions annually.

Country/Area of origin

Australia
Brazil

Law and/or mandatory standard(s)

General assessment of legal compliance
Brazilian Forest Code

Comment

Other - Cocoa

Procedure to ensure legal compliance

All suppliers are required to comply with our Supplier Code of Conduct, which requires compliance with applicable regulations including those related to managing deforestation. Our procurement team maintains continuous communication with direct suppliers via monthly calls and other touchpoints to discuss any issues. We maintain the right to inspect production facilities or review of the applicable documentation to ensure compliance with our Code of Conduct. We provide guidance to our suppliers regarding sub-contracting and require suppliers to replicate these standards down their supply chains. Our Supplier Quality and Risk teams 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. Our Risk team's due diligence screens specifically include criteria related to environmental compliance. In addition, Conagra Brands' Legal and Human Resources teams facilitate internal compliance expectations in supplier operations, with confidential reporting channels for grievances. We feel the procedures are adequate to address sustainability risks due to the fact that the procedures apply to all Conagra suppliers, utilize continuous third party monitoring services, and engage a cross-functional team of experts across multiple Conagra functions to identify emerging compliance risks and apply appropriate expertise to mitigate.

Country/Area of origin

Cameroon
Côte d'Ivoire
Indonesia
Malaysia
Nigeria

Law and/or mandatory standard(s)

General assessment of legal compliance

Comment

F6.7

(F6.7) Are you working with smallholders to support good agricultural practices and reduce deforestation and/or conversion of natural ecosystems?

	Are you working with smallholders?	Type of smallholder engagement approach	Smallholder engagement approach	Number of smallholders engaged	Please explain
Timber products	Not applicable	<Not Applicable>	<Not Applicable>	<Not Applicable>	Smallholder production is not common in the regions where we source.
Palm oil	No, not working with smallholders	<Not Applicable>	<Not Applicable>	<Not Applicable>	We choose to source from suppliers who have smallholder engagement programs, supporting smallholder efforts indirectly.
Cattle products	No, not working with smallholders	<Not Applicable>	<Not Applicable>	<Not Applicable>	We choose to source from suppliers who have smallholder engagement programs, supporting smallholder efforts indirectly.
Soy	Not applicable	<Not Applicable>	<Not Applicable>	<Not Applicable>	Smallholder production is not common in the regions where we source.
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Cocoa	No, not working with smallholders	<Not Applicable>	<Not Applicable>	<Not Applicable>	We choose to source from suppliers who have smallholder engagement programs, supporting smallholder efforts indirectly.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.8

(F6.8) Are you working with your direct suppliers to support and improve their capacity to comply with your forests-related policies, commitments, and other requirements?

	Are you working with direct suppliers?	Type of direct supplier engagement approach	Direct supplier engagement approach	% of suppliers engaged	Please explain
Timber products	Yes, working with direct suppliers	Supply chain mapping Financial and commercial incentives	Supplier questionnaires on environmental and social indicators Financial incentives for certified products	91-99%	These percentages are estimates based on best available data from our suppliers and internal systems. Conagra Brands assesses key suppliers quarterly on sustainability performance and disclosure as part of our Supplier Excellence Program. The program comprises approximately 8 fiber-based packaging suppliers covering approximately 98% of our procured volume for this commodity. We rate suppliers within our Supplier Excellence program based on a review of annual sustainability reports and related documents provided to us by the supplier. Suppliers are rated on metrics including: public response to CDP water, forestry and investor questionnaires; GRI-compliant reporting; and policy/commitments adequately addressing sustainability risks specific to the supplier's industry, including deforestation. Suppliers annually submit sustainability data to Conagra Brands as part of our Supplier Excellence Program scorecard, which we compile in a database for ranking and recognizing suppliers who excel in sustainable and those with improvement opportunities, including relevant sustainability certifications. Conagra Brands annually awards a Supplier Excellence Sustainability award to the top supplier in our score carding process. We annually review or fiber supply chain for the availability of third-party certified product and we look to improve the percentage of supply with sustainability certifications over time. In addition, as part of our Supplier Advisory Board program, we conducted an Environmental, Social and Governance (ESG) risk assessment with one of our largest fiber suppliers, including a questionnaire of key supply chain risks and summary of practices to mitigate, and cross-functional meeting to discuss outputs and identify future improvement areas.
Palm oil	Yes, working with direct suppliers	Supply chain mapping Financial and commercial incentives	Supplier questionnaires on environmental and social indicators Paying higher prices linked to best agricultural practices	91-99%	These percentages are estimates based on best available data from our suppliers and internal systems. Our policy is to only buy from RSPO members in good standing who submit annual communications on progress (ACOPs), and to source RSPO certified sustainable palm oil, which includes a financial premium over non-certified palm oil. We encourage certification and work with multi-stakeholder groups by requiring RSPO for our entire supply, which is outlined in our contractual agreements. In addition, Conagra Brands assesses key suppliers quarterly on sustainability performance and disclosure as part of our Supplier Excellence Program. The program comprises approximately 4 palm oil suppliers covering approximately 96% of our procured volume for this commodity. We rate suppliers within our Supplier Excellence program based on a review of annual sustainability reports and related documents provided to us by the supplier. Suppliers are rated on metrics including: public response to CDP water, forestry and investor questionnaires; GRI-compliant reporting; and policy/commitments adequately addressing sustainability risks specific to the supplier's industry, including deforestation. Suppliers annually submit sustainability data to Conagra Brands as part of our Supplier Excellence Program scorecard, which we compile in a database for ranking and recognizing suppliers who excel in sustainable and those with improvement opportunities. Additionally, we conducted a sustainable sourcing review with our primary palm oil supplier to review RSPO-compliant sourcing practices avoiding deforestation, any grievances submitted and resolution status, and progress on additional traceability beyond RSPO requirements.
Cattle products	Yes, working with direct suppliers	Supply chain mapping Other	Supplier questionnaires on environmental and social indicators Other, please specify (Supplier site visits)	61-70%	These percentages are estimates based on best available data from our suppliers and internal systems. Conagra Brands assesses key suppliers quarterly on sustainability performance and disclosure as part of our Supplier Excellence Program. The program comprises approximately 4 beef suppliers covering approximately 70% of our procured volume for this commodity. We rate suppliers within our Supplier Excellence program based on a review of annual sustainability reports and related documents provided to us by the supplier. Suppliers are rated on metrics including: public response to CDP water, forestry and investor questionnaires; GRI-compliant reporting; and policy/commitments adequately addressing sustainability risks specific to the supplier's industry, including deforestation. Suppliers annually submit sustainability data to Conagra Brands as part of our Supplier Excellence Program scorecard, which we compile in a database for ranking and recognizing suppliers who excel in sustainable and those with improvement opportunities, including relevant certifications. Additionally, we have conducted site visits to a beef supplier in Brazil and the US to review best practices on sustainability topics, including managing deforestation risks. These supplier engagement meetings included Conagra Brands' procurement and sustainability teams.
Soy	Yes, working with direct suppliers	Supply chain mapping	Supplier questionnaires on environmental and social indicators Other, please specify (Supplier site visits)	91-99%	These percentages are estimates based on best available data from our suppliers and internal systems. Conagra Brands assesses key suppliers quarterly on sustainability performance and disclosure as part of our Supplier Excellence Program. The program comprises approximately 3 of our soy suppliers covering approximately 97% of our procured volume for this commodity. We rate suppliers within our Supplier Excellence program based on a review of annual sustainability reports and related documents provided to us by the supplier. Suppliers are rated on metrics including: public response to CDP water, forestry and investor questionnaires; GRI-compliant reporting; and policy/commitments adequately addressing sustainability risks specific to the supplier's industry, including deforestation. Suppliers annually submit sustainability data to Conagra Brands as part of our Supplier Excellence Program scorecard, which we compile in a database for ranking and recognizing suppliers who excel in sustainable and those with improvement opportunities, including relevant certifications. We have also worked with suppliers to gather farm-level information where available. For example, we conducted a farm visit to an Illinois soybean farm that is a source for one of our suppliers to review sustainable farming practices.
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, working with direct suppliers	Supply chain mapping	Supplier questionnaires on environmental and social indicators	81-90%	These percentages are estimates based on best available data from our suppliers and internal systems. Conagra Brands assesses key suppliers quarterly on sustainability performance and disclosure as part of our Supplier Excellence Program. The program comprises approximately 3 cocoa suppliers covering approximately 84% of our procured volume for this commodity. We rate suppliers within our Supplier Excellence program based on a review of annual sustainability reports and related documents provided to us by the supplier. Suppliers are rated on metrics including: public response to CDP water, forestry and investor questionnaires; GRI-compliant reporting; and policy/commitments adequately addressing sustainability risks specific to the supplier's industry, including deforestation. Suppliers annually submit sustainability data to Conagra Brands as part of our Supplier Excellence Program scorecard, which we compile in a database for ranking and recognizing suppliers who excel in sustainable and those with improvement opportunities, including relevant certifications. For example, we conducted a review of sustainable sourcing certification programs available via one of our major cocoa suppliers, including agricultural practices related to deforestation prevention.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.9

(F6.9) Are you working beyond your first-tier supplier(s) to manage and mitigate deforestation risks?

	Are you working beyond first tier?	Type of engagement approach with indirect suppliers	Indirect supplier engagement approach	Please explain
Timber products	Not applicable	<Not Applicable>	<Not Applicable>	Conagra's Supplier Code of Conduct includes deforestation prohibitions and risk mitigation requirements, and states that our suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.
Palm oil	Not applicable	<Not Applicable>	<Not Applicable>	Conagra's Supplier Code of Conduct includes deforestation prohibitions and risk mitigation requirements, and states that our suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.
Cattle products	Not applicable	<Not Applicable>	<Not Applicable>	Conagra's Supplier Code of Conduct includes deforestation prohibitions and risk mitigation requirements, and states that our suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.
Soy	Not applicable	<Not Applicable>	<Not Applicable>	Conagra's Supplier Code of Conduct includes deforestation prohibitions and risk mitigation requirements, and states that our suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Cocoa	Not applicable	<Not Applicable>	<Not Applicable>	Conagra's Supplier Code of Conduct includes deforestation prohibitions and risk mitigation requirements, and states that our suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.10

(F6.10) Do you participate in external activities and/or initiatives to promote the implementation of your forests-related policies and commitments?

Forest risk commodity

Timber products

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

Other, please specify (Sustainable Packaging Coalition)

Jurisdictional approaches

<Not Applicable>

Please explain

Conagra Brands' Sr. director responsible for sustainability strategy represents the company at AMERIPEN to help drive industry discussions and action around sustainable packaging issues. We have access to SFI and FSC certified materials via our supplier based and have engaged in multiple stakeholder discussions related to sustainable forestry. Conagra Brands is a member of the Sustainable Packaging Coalition, and we are one of the largest users of the How2Recycle label program.

Forest risk commodity

Soy

Do you participate in activities/initiatives?

Yes

Activities

Involved in industry platforms

Initiatives

<Not Applicable>

Jurisdictional approaches

<Not Applicable>

Please explain

Conagra Brands is a member of the US Farmers and Ranchers in Action, and our Sr. Director of sustainability participates in rancher dialogues about decreasing the environmental footprint of US agriculture, including soy farming, as part of the organization's efforts to create a carbon neutral US agriculture industry by 2030. The organization goal to be carbon neutral support's Conagra's own efforts to reduce the environmental impacts of its soy supply in preparation for our 2030 Scope 3 greenhouse gas reduction target.

Forest risk commodity

Palm oil

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

Roundtable on Sustainable Palm Oil (RSPO)

Jurisdictional approaches

<Not Applicable>

Please explain

Conagra Brands is a member of the Roundtable on Sustainable Palm Oil (RSPO), and we have been publishing annual communications on progress to the RSPO website since 2011.

Forest risk commodity

Cattle products

Do you participate in activities/initiatives?

Yes

Activities

Involved in industry platforms

Initiatives

<Not Applicable>

Jurisdictional approaches

<Not Applicable>

Please explain

Conagra Brands is a member of the US Farmers and Ranchers in Action, and our sr. director of sustainability participates in rancher dialogues about decreasing the environmental footprint of US agriculture, including cattle ranching, as part of the organization's efforts to create a carbon neutral US agriculture industry by 2030. The organization goal to be carbon neutral support's Conagra's own efforts to reduce the environmental impacts of its beef supply in preparation for our 2030 Scope 3 greenhouse gas reduction target.

Forest risk commodity

Other - Cocoa

Do you participate in activities/initiatives?

Yes

Activities

Engaging with non-governmental organizations

Initiatives

<Not Applicable>

Jurisdictional approaches

<Not Applicable>

Please explain

We engage in shareholder and industry dialogues on sustainable sourcing and deforestation issues, including for cocoa, with organizations such as Ceres, an NGO that facilitates multi-stakeholder collaboration to address issues in agricultural supply chains.

F6.11

(F6.11) Is your organization supporting or implementing project(s) focused on ecosystem restoration and protection?

Yes

F6.11a

(F6.11a) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).

Project reference

Project 1

Project type

Other ecosystem restoration

Primary motivation

Voluntary

Description of project

As part of the 2019 Conagra Sustainable Development Awards program, our Kent, Washington facility directed a \$5,000 grant to the non-profit Duwamish River Cleanup Coalition Technical Advisory Group. The Duwamish River Cleanup Coalition Technical Advisory Group is involved in all aspects of the cleanup of the Duwamish River. As a result of nearly a century of industrial activity, the Duwamish River is a designated Superfund Site by the United States Environmental Protection Agency (EPA), identifying it as one of the nation's most toxic hazardous waste sites. Conagra's support of the organization began in 2019, and was a voluntary engagement driven by corporate values and local facility employee passion for the organization and its work. Conagra's grant will go towards funding several programs including the Duwamish Valley Youth Corps which support and train the next generation of community leaders through environmental and health improvement projects.

Start year

2019

Target year

2036-2040

Project area to date (Hectares)

71

Project area in the target year (Hectares)

166

Country/Area

United States of America

Latitude

47.53675

Longitude

-122.329722

Monitoring frequency

Six-monthly or more frequently

Measured outcomes to date

Soil

Water

Please explain

According to public disclosures and best available data, a total of 5.5 miles of the Duwamish River and 412 acres (166 hectares) was identified to be cleaned up via construction and remediation activities by 2027. Expected outcomes include several engineered remediation and restoration projects: 105 acres of riverbed dredging to remove toxins; 24 acres of "capped" layers of sand designed to trap toxic river mud beneath; 48 acres of enhanced natural recovery treated with a 6 to 9-inch layer of sand; and 35 acres of monitored natural ecosystem recovery that will receive no treatment and will be monitored to see if sedimentation covers the remaining pollution over time. Results will be monitored for 100 years after remediation is complete. Remediation plans have been released on the organization's website addressing 177 acres (71 hectares), and contaminated soils and river sediment have been removed from some of the targeted acreage.

F7. Verification

F7.1

(F7.1) Do you verify any forests information reported in your CDP disclosure?

Yes

F7.1a

(F7.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

Disclosure module

F6. Implementation

Data points verified

Supply chain certification our production facilities that use palm oil

Verification standard

RSPO Mass Balance (Supply Chain Certification)

Please explain

We have secured supply chain certification for several of our production facilities that use palm oil. Certification of these facilities enable use of Mass Balance certified palm oil. An RSPO-approved, third-party auditor conducts annual reviews of our manufacturing facilities that use palm oil to ensure our palm oil management procedures comply with the RSPO Supply Chain standard for traceability. We maintain relevant documentation related to annual audits and submit audit certifications to customers (e.g. a large retailer) as part of verifying sustainable palm oil use within customer supply chains.

F8. Barriers and challenges

F8.1

(F8.1) Describe the key barriers or challenges to eliminating deforestation and/or conversion of other natural ecosystems from your direct operations or from other parts of your value chain.

Forest risk commodity

Timber products

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

Conagra is not vertically integrated for this commodity, and we rely on our supply chain to manage deforestation risks at the forest level.

Forest risk commodity

Palm oil

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

Conagra is not vertically integrated for this commodity, and we rely on our supply chain to manage deforestation risks at the forest level.

Forest risk commodity

Cattle products

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

Conagra is not vertically integrated for this commodity, and we rely on our supply chain to manage deforestation risks at the forest level.

Forest risk commodity

Soy

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

Conagra is not vertically integrated for this commodity, and we rely on our supply chain to manage deforestation risks at the forest level.

Forest risk commodity

Other - Cocoa

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

Conagra is not vertically integrated for this commodity, and we rely on our supply chain to manage deforestation risks at the forest level.

F8.2

(F8.2) Describe the main measures that would improve your organization's ability to manage its exposure to deforestation and/or conversion of other natural ecosystems.

Forest risk commodity

Timber products

Coverage

Supply chain

Main measure

Greater stakeholder engagement and collaboration

Comment

Forest risk commodity

Palm oil

Coverage

Supply chain

Main measure

Greater stakeholder engagement and collaboration

Comment

Forest risk commodity

Cattle products

Coverage

Supply chain

Main measure

Greater stakeholder engagement and collaboration

Comment

Forest risk commodity

Soy

Coverage

Supply chain

Main measure

Greater stakeholder engagement and collaboration

Comment

Forest risk commodity

Other - Cocoa

Coverage

Supply chain

Main measure

Greater stakeholder engagement and collaboration

Comment

F17 Signoff

F-FI

(F-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.

F17.1

(F17.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

	Job Title	Corresponding job category
Row 1	Senior Vice President & Interim Chief Supply Chain Officer	Chief Operating Officer (COO)

SF. Supply chain module

SF0.1

(SF0.1) What is your organization's annual revenue for the reporting period?

	Annual revenue
Row 1	11054400000

SF0.2

(SF0.2) Do you have an ISIN for your organization that you are willing to share with CDP?

No

SF1.1

(SF1.1) In F6.3 you were asked "Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)? Indicate the volume and percentage of your certified production and/or consumption". Can you also indicate, for each of your disclosed commodity(ies), the percentage of certified volume sold to each requesting CDP supply chain member?

No

SF1.1b

(SF1.1b) Why can you not indicate the percentage of certified volume sold to each of your requesting CDP supply chain members? Describe any future plans for adopting and communicating levels of certification to requesting members.

Requesting member

Symrise AG

Forest risk commodity

Timber products

Primary reason

Insufficient resources to complete collection of data

Please explain

Requesting member

Symrise AG

Forest risk commodity

Palm oil

Primary reason

Insufficient resources to complete collection of data

Please explain

Requesting member

Symrise AG

Forest risk commodity

Cattle products

Primary reason

Insufficient resources to complete collection of data

Please explain

Requesting member

Symrise AG

Forest risk commodity

Soy

Primary reason

Insufficient data on what is sold to requesting member

Please explain

Requesting member

Symrise AG

Forest risk commodity

Timber products

Primary reason

Insufficient resources to complete collection of data

Please explain

Requesting member

Symrise AG

Forest risk commodity

Palm oil

Primary reason

Insufficient resources to complete collection of data

Please explain

Requesting member

Symrise AG

Forest risk commodity

Cattle products

Primary reason

Insufficient resources to complete collection of data

Please explain

Requesting member

Symrise AG

Forest risk commodity

Soy

Primary reason

Insufficient data on what is sold to requesting member

Please explain

SF2.1

(SF2.1) Please propose any mutually beneficial forests-related projects you could collaborate on with specific CDP supply chain members.

SF2.2

(SF2.2) Have requests or initiatives by CDP supply chain members prompted your organization to take organizational-level action to reduce or remove deforestation/forest degradation from your operations or your supply chain?

No

SF3.1

(SF3.1) For your disclosed commodity(ies), do you estimate the GHG emission reductions and/or removals from land use and land use change that have occurred in your direct operations and/or supply chain?

Timber products

Estimate GHG emissions and removals from land use and land use change

No

Please explain

Palm oil

Estimate GHG emissions and removals from land use and land use change

No

Please explain

Cattle products

Estimate GHG emissions and removals from land use and land use change

No

Please explain

Soy

Estimate GHG emissions and removals from land use and land use change

No

Please explain

Other - Cocoa

Estimate GHG emissions and removals from land use and land use change

No

Please explain

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, I will submit the Supply Chain questions now

Please confirm below

I have read and accept the applicable Terms