



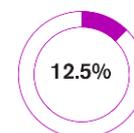
Conagra

Score: 18.5% | Rank: 13th

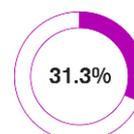
Conagra has an overall score of 18.5% and ranks 13th amongst the 25 evaluated companies. Conagra's strongest area relative to its peers was Disclosure (1st), followed by Management systems (14th) and Policy commitments (16th).

The third page has an overview of the scores achieved by Conagra per indicator within each section. Please note that all scores and summaries are based on published information only.

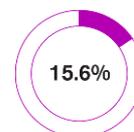
Policy
Commitments



Management
Systems



Disclosure



Elements in Place

- Policy commitments:** Conagra's publicly available Code of Conduct contains anti-bribery and corruption (ABC) provisions, providing specific guidance on gifts (what is permissible and what is not), examples/scenarios of what constitutes bribery/corruption, guidance on what to do if one becomes aware of any potential or actual bribery/corruption, and clear reporting process. The company also has a specific Anti-Bribery and Anti-Corruption Policy that is not publicly available.
- Management systems:** Conagra's Executive Vice President and General Counsel routinely reviews the company's government affairs activities. Meanwhile, the Nominating and Corporate Governance Committee of the Board of Directors is provided with periodic (at least annual) updates on Conagra's political spending, activities, and participation in trade associations, and "oversees political contributions and lobbying expenditures, to ensure they focus on adding shareholder value and enhancing our position as a good corporate citizen."¹ The company has a whistleblowing mechanism called EthicsPoint, presented in its Code of Conduct.
- Disclosure:** On its 'Political Activity Disclosure' webpage, Conagra publishes a list of trade associations for which dues are used for lobbying purposes and publishes the amount for each; all are US-based. The company discloses information about its political expenditures in the US, and publishes a link to its Lobbying Disclosure Act (LDA) reports. It also indicates that one of its four areas of focus for political engagement is "Nutrition".

¹ Conagra Brands (2021). *2021 Proxy Statement*. Mendota Heights: Conagra Brands. P34. Available at: https://materials.proxyvote.com/Approved/205887/20210726/NPS_476883.PDF. (Accessed: 20/06/2022).



Recommendations for improvement

- **Policy commitments:** Conagra is encouraged to commit to ensuring that its lobbying activities support governments' policy efforts to align with SDGs 2 and 3, and the WHO Global Action Plan for the Prevention and Control of NCDs 2013-2030. Conagra is also recommended to commit to disclose all political contributions made in all markets, or make no such contributions outside of the US. The company is also encouraged to review the OECD Principles for Transparency and Integrity in Lobbying and the Transparency International Standards for Lobbying Regulation and integrate them into a responsible lobbying policy. Conagra is also recommended to publish its Anti-Bribery and Anti-Corruption Policy.
- **Management systems:** Conagra is recommended to describe approaches to addressing potential misalignment between its own lobbying positions and those of its trade associations. Conagra is also encouraged to develop (or disclose) processes to inform and train staff and third-parties involved in lobbying about its policies, standards, and systems. Finally, Conagra should publish access to EthicsPoint more prominently on its website, to increase awareness and ensure ease of access, and ensure that it is communicated to employees as part of the onboarding process and/or training sessions.
- **Disclosure:** Conagra should be more specific about its lobbying positions and activities in relation to specific public health measures that affects industry, as well as its lobbying-related expenditures. The company is also encouraged to disclose more information about its lobbying and political activities outside of the US, or state that no such activities are undertaken. Regarding its trade association memberships, Conagra should indicate whether it holds any Board seats, and publish a brief description of the purpose and/or activities undertaken by the trade association on behalf of the company.



#	Score per indicator for Conagra	Company score	Average score
Policy commitments: 10 total / 80 maximum			
1	Commitment to not lobby against (or commitment to only lobby in support of) public health policies/measures	0.0	1.2
2	Commitment to respect public health policy frameworks in its lobbying activities	0.0	0.6
3	Respect for relevant lobbying standards and codes	0.0	1.8
4	Political donations	0.0	3.6
5	Codes of conduct to prevent bribery & corruption	10.0	7.9
6	Controls over trade associations and industry policy groups	0.0	2.0
7	Crowding out	0.0	0.6
8	Working with others in pursuit of the public interest	0.0	1.1
Management systems: 25.0 total / 80 maximum			
9	Accountability and responsibility for policy implementation	10.0	4.9
10	Conflicts of interest and revolving door	0.0	1.0
11	Anti-bribery and corruption	5.0	6.8
12	Political donations	0.0	2.4
13	Controls over membership of associations/organizations	5.0	2.4
14	Controls over lobbyists to ensure that they understand and adhere to the company's policies	0.0	2.3
15	Auditing	0.0	0.1
16	Whistleblowing mechanisms	5.0	6.1
Disclosure: 29.6 total / 190 maximum			
17	Taxation of products with high added sugar.	0.0	0.6
18	Measures to regulate the marketing of unhealthy foods to children.	0.0	0.9
19	Front-of-pack (FOP) labelling requirements.	0.0	1.8
20	Influencing national dietary guidelines.	0.0	0.7
21	Other policies to improve public health and diets.	0.0	2.0
22	Disclosure of key lobbying information	0.0	2.0
23	Memberships of trade associations	5.6	3.2
24	Activities undertaken by trade associations	0.0	0.0
25	Alignment between lobbying principles and trade associations	0.0	0.1
26	Expenditures on trade associations	7.5	1.2
27	Expenditures on lobbyists (in-house and third party)	2.5	1.8
28	Political donations and contributions	5.0	2.3
29	Conflicts of interest	0.0	0.0
30	Auditing	0.0	0.2
31	Whistleblowing mechanisms	0.0	2.7
32	Other disclosures	0.0	0.4
33	External stakeholder engagement	0.0	0.3
34	Disclosure of lobbying policy	5.0	4.5
35	Main disclosure regarding lobbying activities/expenditures	4.0	3.0
Total: 64.6 / 350 maximum			