

Particulars

About Your Organisation

1.1 Name of your organization

Conagra Brands, Inc.

1.2 What is/are the primary activity(ies) or product(s) of your organization?

- Grower
 - Processor and/or Trader
 - Consumer Goods Manufacturer
 - Retailer and/or Wholesaler
 - Bank and/or Investor
 - Social and/or Development NGO
 - Environmental and/or Conservation NGO
 - Supply Chain Associate
 - Affiliate
-

1.3 Membership number

4-0013-06-000-00

1.4 Membership category

Consumer Goods Manufacturers

1.5 Membership sector

Ordinary

Consumer Goods Manufacturer

1. Operational Profile

1.1 Please state your main activity(ies) within the palm oil supply chain. Please select the option(s) that apply to you

- End-product manufacturer
- Food goods manufacturer
- Ingredient manufacturer
- Home & personal care goods manufacturer
- Own-brand manufacturer
- Manufacturing on behalf of other third-party brands
- Biofuels manufacturer
- Other

Other:

2. Palm Oil and Certified Sustainable Palm Oil Use

2.1 Please include details of all operations using palm oil, owned and/or managed by the member and/or all entities that belong to the group.

Calendar year 2018 goals progress and ACOP data applies to legacy Conagra Brands purchase of palm oil. Conagra Brands is currently integrating its palm oil supply with legacy Pinnacle Foods, and our 2020 ACOP will reflect calendar year 2019 palm oil purchases for the combined company.

2.1.1 In which markets do you manufacture goods with palm oil and oil palm products?

Mexico , United States

2.1.2 In the market(s)/country(ies) where you operate, do you calculate how much palm oil and oil palm product there is in the goods you manufacture?

Yes

2.2 Volumes of palm oil and oil palm products purchased

2.2.1 Total volume of crude and refined palm oil used in the year (tonnes)

44,000.00

2.2.2 Total volume of crude and refined palm kernel oil used in the year (tonnes)

2,200.00

2.2.3 Total volume of palm kernel expeller used in the year (tonnes)

0.00

2.2.4 Total volume of other palm-based derivatives and fractions used in the year (tonnes)

0.00

2.2.5 Total volume of all palm oil and oil palm products used in the year (tonnes)

46,200.00

2.3 Volume of palm oil and oil palm products used in the year in your own brand products that are RSPO-certified (in tonnes):

Description	Crude and Refined Palm Oil	Crude and Refined Palm Kernel Oil	Palm Kernel Expeller	Other palm-based derivatives and fractions
2.3.1 Book and Claim from Mill / Crusher	22000	400	-	-
2.3.2 Book and Claim from Independent Smallholder	-	-	-	-
2.3.3 Mass Balance	22000	1800	-	-
2.3.4 Segregated	-	-	-	-
2.3.5 Identity Preserved	-	-	-	-
2.3.6 Total volume	44000	2200	-	-

2.4 Volume of RSPO-certified palm oil and oil palm products sold to 3rd party RSPO certified companies (in tonnes)

Description	Crude and Refined Palm Oil	Crude and Refined Palm Kernel Oil	Palm Kernel Expeller	Other palm-based derivatives and fractions
2.4.1 Book and Claim from Mill / Crusher	-	-	-	-
2.4.2 Book and Claim from Independent Smallholder	-	-	-	-
2.4.3 Mass Balance	-	-	-	-
2.4.4 Segregated	-	-	-	-
2.4.5 Identity Preserved	-	-	-	-
2.4.6 Total volume	-	-	-	-

2.5 According to the information you have provided in this questionnaire, your company has not reached 100% sustainable palm yet by using the four supply chain models (Book and Claim, MB, SG, IP). Do you have plans to immediately cover the gap by using RSPO Credits?

2.5.1 When do you plan to cover the gap by using RSPO Credits?

--

2.5.2 Please explain why

-

2.6 What is the percentage of RSPO Certified Sustainable Palm Oil in the total palm oil used by your company in the following regions:

2.6.1 Africa

0%

2.6.2 Oceania

0%

2.6.3 Europe

0%

2.6.4 North America

100%

2.6.5 Latin America

0%

2.6.6 Middle East

0%

2.6.7 China

0%

2.6.8 India

0%

2.6.9 Indonesia

0%

2.6.10 Malaysia

0%

2.6.11 Rest of Asia

0%

3. Time-Bound Plan

3.1 Year of first supply chain certification (planned or achieved)

2013

3.2 Year expected to/or started to use any RSPO-certified sustainable palm oil and oil palm products in your own brand products

2011

3.2.1 If target has not been met, please explain why.

N/A

3.3 Year expected to be using 100% RSPO-certified sustainable palm oil and oil palm products from any supply chain option in your own brand products.

2014

3.3.1 If target has not been met, please explain why.

N/A

3.4 Year expected to be using 100% RSPO-certified sustainable palm oil and oil palm products from physical supply chains (Identity Preserved, Segregated and/or Mass Balance) in your own brand products.

2020

3.4.1 If target has not been met, please explain why.

N/A

3.4.2 Which markets do these commitments cover?

Mexico , United States

3.5 Does your company use RSPO-certified sustainable palm oil and oil palm products in goods you manufacture on behalf of other companies?

Yes

3.6 Does your company have a Time-Bound Plan to only use RSPO-certified sustainable palm oil and oil palm products in the goods you manufacture on behalf of other companies?

Yes

3.7 When do you expect all products you manufacture to only contain RSPO-certified sustainable palm oil and oil palm products?

2014

4. Trademark Use

4.1 Do you use or plan to use the RSPO Trademark on your own brand products?

Yes

4.2 Please select the countries where you use or intend to apply the Trademark.

Mexico , United States

4.2.1 Please state the year that you started using the RSPO Trademark or the year you plan to start using the RSPO Trademark.

2017

4.3 Please explain why

- Challenging reputation of palm oil
 - Confusion among end-consumers
 - Costs of changing labels
 - Difficulty of applying for RSPO Trademark
 - Lack of customer demand
 - Limited label space
 - Low consumer awareness
 - Low usage of palm oil
 - Risk of supply disruption
 - Others
-

Other:

4.4 Have you uploaded information and images of products using the RSPO Trademark to the RSPO mobile app?

No

5. Actions for Next Reporting Period

5.1 Outline actions that you will take in the coming year to promote the use of RSPO-certified sustainable palm oil and oil palm products along the supply chain.

Since 2011, we have been communicating our sustainable palm oil purchases as a member of the Roundtable on Sustainable Palm Oil (RSPO), an organization dedicated to promoting the growth and use of sustainable palm oil products through credible global standards and stakeholder engagement. We purchase palm oil only from RSPO members in order to support development of a sustainable, cost-effective market for palm oil. To prepare for 100 percent RSPO Mass Balance adoption by 2020, we have secured supply chain certification for 100 percent of production facilities that used palm oil for legacy Conagra Brands in 2018. Certification of these facilities enable use of Mass Balance certified oil for 100 percent of our palm oil products.

6. Non-Disclosure of Information

6.1 Information in the sections above are mandatory declarations in your ACOP. For confidentiality purposes, members may choose not to display volume data in Section 2 publicly; however, RSPO reserves the right to utilise the member's data on an aggregate basis for sectoral and total analysis. Please check this box if the member chooses to have the data in Section 2 displayed publicly.

Yes - Display Publicly

7. Application of Principles & Criteria for all member sectors

7.1 Related to company's procurement or operations, do you have organisational policies that are in line with the RSPO P&C? Select all relevant options.

7.1.A Water, land, energy and carbon footprints

File: --

Link: <https://www.conagrabrands.com/our-company/corporate-social-responsibility>

7.1.B Land use rights

File: --

Link: <https://www.conagrabrands.com/our-company/corporate-social-responsibility>

7.1.C Ethical conduct and human rights

File: --

Link: <https://www.conagrabrands.com/our-company/corporate-social-responsibility>

7.1.D Labour rights

File: --

Link: <https://www.conagrabrands.com/our-company/corporate-social-responsibility>

7.1.E Stakeholder engagement

File: --

Link: <https://www.conagrabrands.com/our-company/corporate-social-responsibility>

7.1.F None of the above. Please explain why.

-

7.2 What best practice guidelines or information has your organisation provided in the past year to facilitate the uptake of RSPO-certified sustainable palm oil and oil palm products? What languages are these guidelines available in?

One hundred percent of the palm oil we purchase today adheres to RSPO standards for environmental and social responsibility.

This means that all of our suppliers, landholdings and operations meet the following principles:

- Only legal sources that adhere to all relevant international, national and local legislation and regulation
- No development on high conservation value landscapes or high carbon stock (HCS) forests.
- No development on peat lands regardless of depth and use of best management practices for existing plantations on peat.
- No burning in the preparation of new plantings, re-plantings or other developments and the progressive reduction of GHG emissions.
- Respect for land tenure rights, including the rights of indigenous and local communities to give or withhold their free, prior and informed consent to all new development or operations on lands to which they hold legal, communal or customary rights. Prevention and resolution of social and/or land conflicts through an open, transparent and consultative process.
- Traceability to the extraction mill and validation of fresh fruit bunches to the plantation estate. Adherence to RSPO standards is verified either via Book and Claim or Mass Balance systems.

This guidance is available in English as part of our annual Citizenship Report [<https://www.conagrabrands.com/our-company/corporate-social-responsibility>].

8. Greenhouse Gas (GHG) Footprint

8.1 Are you currently reporting any GHG footprint?

Yes

8.1.1 Please upload your publicly available GHG report

File: --

8.1.1.1 OR please insert the URL to the GHG section of your corporate website.

Link: <https://www.conagrabrands.com/our-company/corporate-social-responsibility>

8.2 Please explain and justify why you are not calculating your GHG footprint. Please include any future plans you may have to calculate your GHG footprint.

-

8.3 What methodology are you using to calculate your GHG footprint?

GHG Protocol via annual CDP climate change questionnaire. We calculate market-based Scope 1 and 2 emissions, and select Scope 3 GHG emissions.

9. Support for Oil Palm Smallholders

9.1 Are you currently supporting any oil palm Independent Smallholder groups?

No

9.2 How are you supporting them?

-

9.2.1 Do you have any future plans to support oil palm Independent Smallholders?

No

9.2.2 When do you plan to start your support for oil palm Independent Smallholders?

--

10. Challenges

10.1 What significant economic, social or environmental obstacles have you encountered in the production, procurement, use and/or promotion of CSPO and what efforts did you make to mitigate or resolve them?

- Awareness of RSPO in the market
 - Difficulties in the certification process
 - Certification of smallholders
 - Competition with non-RSPO members
 - High costs in achieving or adhering to certification
 - Human rights issues
 - Insufficient demand for RSPO-certified palm oil
 - Low usage of palm oil
 - Reputation of palm oil in the market
 - Reputation of RSPO in the market
 - Supply issues
 - Traceability issues
 - Others
-

Other:

Transportation delays due to 2017 Atlantic/Gulf of Mexico hurricanes Harvey and Irma closed ports and delayed palm oil shipments across the industry. The inability to receive offshore palm oil supplies due to extreme weather increased palm oil costs for Conagra Brands. We mitigated the impact of this by developing spot contracts with suppliers who had readily available palm oil supplier already in the US. Our mitigation strategy avoided production delays. Conagra Brands discloses financial impacts in compliance with applicable regulations. Conagra Brands did not experience a material financial impact from this driver warranting external disclosure based on this approach. There was no resulting impact on product pricing.

10.2 In addition to the actions already reported in this ACOP, how has your organisation supported the vision of RSPO to transform the market for sustainable palm oil in other ways?

- Engagement with business partners or consumers on the use of CSPO
 - Engagement with government agencies
 - Promotion of CSPO outside of RSPO venues eg trade workshops industry associations
 - Promotion of physical CSPO
 - Providing funding or support for CSPO development efforts
 - Research & Development support
 - Stakeholder engagement
 - Others
-

Other:

10.3 Please attach or add links to any other information from your organisation on your palm oil policies and activities (e.g.: sustainability reports, policies, other public information)

-
