













# **Campbell Soup Company Anti-Slavery and Human Trafficking Statement**

The California Transparency in Supply Chains Act of 2010 (SB 657) and the United Kingdom Modern Slavery Act of 2015 require certain businesses to provide disclosures and take other actions concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. Similarly, the revised Federal Acquisition Regulation (FAR) 52.222-50 ("Combating Trafficking in Persons") and new FAR provision 52.222-56 ("Certification Regarding Trafficking in Persons Compliance Plan") are aimed at removing slavery and human trafficking from the U.S. Federal Government contracting supply chain. This Anti-Slavery and Human Trafficking Statement ("Statement") addresses these statutes and regulations and covers all of Campbell's companies worldwide.

Many of Campbell's companies are not strictly subject to these statues or regulations, and none may be subject to the UK statute. We have nonetheless undertaken an enterprise-wide approach to our efforts with respect to the anti-slavery and human rights concerns these statutes and regulations embody, and make this Statement on behalf of all of our companies (collectively, "Campbell").

We recognize that slavery and human trafficking can occur in many forms, including forced labor, child labor, domestic and indentured servitude, sex trafficking, and workplace abuse. Therefore, the terms "slavery and human trafficking" as used in this document include these various forms of coerced labor.

### **Our Business**

Campbell is driven and inspired by our purpose, *Real food that matters for life's moments*. We make a range of high-quality soups and simple meals, beverages, snacks and packaged fresh foods. Led by our iconic *Campbell's* brand, our portfolio includes *Pepperidge Farm, Bolthouse Farms, Arnott's, V8, Swanson, Pace, Prego, Plum, Royal Dansk, Kjeldsens* and *Garden Fresh Gourmet*. More details about our operations can be found in the Corporate Profile section of our <u>Corporate Responsibility Report</u>.

### **Our Supply Chain**

Campbell currently sources ingredients, goods and services from thousands of suppliers globally. Like many consumer goods companies, our supply chain is complex, and there are limits to visibility beyond the first tier of suppliers. Efficiently and effectively assessing and addressing supply chain issues such as human rights beyond the first tier is often challenging. However, we are beginning with our first-tier suppliers and are on a continuous journey of more complete traceability and transparency throughout our global supply chain.

### **Our Relevant Policies**

We currently have three relevant policies that address human rights:

Campbell's <u>Code of Business Conduct and Ethics</u> supports our purpose and values. This Code is provided to all of our employees globally and sets out our collective and individual commitment to conducting business ethically, and in accordance with all applicable laws, regulations, as well as with a high standard of ethics and responsibility. Our Code also sets forth expectations on human rights, which are further detailed in our Human Rights Principles.

Our <u>Human Rights Principles</u> detail Campbell's position on our core human rights principles – diversity, prohibition of discrimination, harassment, and child and forced labor; expectations on wage and working hours; providing a safe and secure workplace and enabling freedom of association to trade unions.

Our Responsible Sourcing Supplier Code, which accompanies our Supply Base Requirements and Expectations Manual, was developed to help drive higher ethical and sustainable standards in our supply chain. It sets forth the minimum standards required of Campbell suppliers in several areas including business integrity, human rights and labor, health and safety and environmental impact.

# **Due Diligence Processes for Slavery and Human Trafficking**

In order to prevent slavery and human trafficking in our business and supply chain we are implementing a due diligence process. Steps include:

- Internal Leadership. Campbell's Real Food Philosophy includes a commitment to
  ensuring that the products we make are crafted with ethically and sustainably sourced
  ingredients. Campbell's Director of Procurement Corporate Responsibility is leading the
  development and implementation of the Company's Responsible Sourcing Program.
  Campbell's Corporate Responsibility and Procurement groups are working
  collaboratively to promote Campbell's responsible sourcing practices, including practices
  designed to prevent slavery and human trafficking. These groups also proactively
  communicate with external stakeholders and monitor trends and best practices in this
  area.
- Responsible Sourcing Program. Campbell's Responsible Sourcing Supplier Code is the foundation of our Responsible Sourcing Program. This Code was recently developed and is being communicated to our suppliers this fiscal year. We will begin holding our suppliers accountable to this Code in our 2018 Fiscal Year.
- Risk Assessment. As described below, we are undertaking a risk assessment of our supply chain to better understand the potential risks related to slavery and human trafficking.

# Assessment of Risks in our Business and Supply Chain

Campbell is committed to working with our suppliers and other stakeholders to understand further potential areas of risk and to increase transparency. We seek to use our influence to help mitigate any negative impacts identified.

In 2014, we partnered with Business for Social Responsibility (BSR) to perform an assessment of our agricultural supply chain, measuring the potential risk of various crops, including tomatoes, jalapeños, and sweet potatoes. Currently, we are working with a third-party to

perform a comprehensive risk assessment of our ingredient supply chain. This assessment will help us understand where human rights and labor issues may exist within our global supply chain so that we can prioritize and focus our responsible sourcing efforts.

### **Our Effectiveness in Combating Slavery and Human Trafficking**

We evaluate slavery and human trafficking risks as part of some of our audits conducted by our Quality team. These audits are performed on a rotating basis and are announced to our suppliers in advance. We anticipate that a broader social auditing program will begin, on a risk-based approach, in Campbell's 2018 fiscal year, as part of the roll-out of the Responsible Sourcing Program.

### **Training**

Training is an important element of implementing effective human rights practices. Each year, Campbell provides comprehensive online and in-person training for employees on ethics and compliance issues and risk-based training tailored to the issues associated with employees' specific job responsibilities. As part of the *Winning With Integrity* program, employees are required to complete annual training on our Code of Business Conduct and Ethics. This training, offered in multiple languages, is available online for most employees, but also offered in DVD format for employees in our manufacturing facilities.

No later than the end of Campbell's 2018 fiscal year, all employees and managers who have direct responsibility for supply chain procurement will be required to complete training on the Responsible Sourcing Supplier Code, which will contain content specific to recognizing possible signs of slavery and human trafficking and mitigating risks within the supply chain of our products. We will be implementing similar training for our suppliers in the future.

### Want to Know More?

Read more about our responsible sourcing efforts in our annual <u>Corporate Responsibility</u> <u>Report.</u>