



## **Coerced Labor in Supply Chains Statement**

Updated May 31, 2024

*The [California Transparency in Supply Chains Act](#), the [United Kingdom Modern Slavery Act of 2015](#), and the [Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act](#) 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 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 Coerced Labor in Supply Chains Statement (“Statement”) addresses these statutes and regulations and covers all of Campbell Soup Company’s (“Campbell”) companies worldwide.*

*This Statement responds to the California Transparency in Supply Chains Act, the United Kingdom’s Modern Slavery Act, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act disclosure requirements, even though Campbell is not subject to the United Kingdom’s Modern Slavery Act. We have undertaken an enterprise-wide approach to our efforts with respect to the coerced labor and human rights concerns these statutes and regulations embody and make this Statement on behalf of the entire enterprise.<sup>1</sup>*

*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 term “Coerced Labor” as used in this document includes these various forms of slavery and human trafficking.*

### **Our Business**

Campbell is driven and inspired by our purpose, *Connecting people through food they love*. 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*, *V8*, *Swanson*, *Pace*, *Prego*, *Pacific Foods*, *Snyder’s of Hanover*, *Lance*, *Kettle Brand*, *Cape Cod*, *Snack Factory Pretzel Crisps*, *Pop Secret*, *Late July*, and other brand names.

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<sup>1</sup> For the purposes of the Canadian Act, this Statement is being made on behalf of Campbell Company of Canada.

## **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 on a continuous journey of more complete traceability and transparency throughout our global supply chain.

## **Policies and Statements Addressing Human Rights**

Campbell's [Code of Business Conduct and Ethics](#) supports our purpose and values. This Code is provided to every Campbell employee and sets out our collective and individual commitment to conducting business ethically, responsibly, and in accordance with all applicable laws and regulations. Our Code also sets forth Campbell's expectations on human rights, which are further detailed in our [Human Rights Principles](#).

Our [Human Rights Principles](#) 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](#) (the "Supplier Code") was developed to help drive higher ethical and sustainable standards in our supply chain. It sets forth Campbell's expectations and requirements for suppliers in several areas, including business integrity, human rights and fair labor practices, health and safety, and environmental impact. Campbell's standard purchase order includes terms requiring Suppliers to acknowledge they have reviewed the Supplier Code and agree to comply therewith.

This Statement sets out the steps Campbell takes to ensure that Coerced Labor does not taint our supply chain and serves as a reinforcement of our long-standing policy of conducting business with suppliers who share our same values and high ethical standards.

## **VERIFICATION**

Campbell engages in a series of verification activities to identify, assess, and manage the risk of Coerced Labor in our global supply chain. More specifically:

Expectation-Setting. Campbell's first step in the verification process is to set clear expectations for our Suppliers through the contracting documentation they are expected to review, acknowledge, and execute. Campbell's Supplier Code applies to every direct and indirect supplier, and, as noted, acknowledgement and agreement to comply therewith is a condition outlined in our standard purchase orders. In addition, Suppliers are expected to inform their workers about the expectations outlined in the Supplier Code.

The Supplier Code provides clear guidance on Campbell’s expectations and addresses topics such as compliance with laws, ethics, child labor, forced labor, abuse and harassment, fair and equal treatment, compensation, benefits, working hours, hiring practices, freedom of association, health and safety, environment, and animal welfare, work hours, wages, safety and health, non-discrimination, and harassment.

Due Diligence Screening. As part of the process of identifying new Suppliers, Campbell includes inquiries specifically designed to identify and assess Coerced Labor risks. In addition, Campbell uses a variety of factors and tools to determine a Supplier’s potential for social and environmental risks. More specifically, Campbell takes into account the geography of origin and the industry practices for each direct material. Based on the initial determination of risk, Campbell may require a Supplier to complete a Self-Assessment Questionnaire or to submit to or provide a Responsible Sourcing audit.

Compliance Communications. We may send our suppliers targeted communications (i) reminding them of their ongoing obligation to comply with the Supplier Code, including those terms dealing with human trafficking and Coerced Labor; and (ii) instructing them to immediately notify us if and when they have reason to believe they are in violation of our clearly-articulated expectations and requirements.

Labor Brokers. Campbell takes steps to assess potential risks related to labor brokers and third-party recruiters in our supply chain. The Supplier Code requires that “[w]orkers shall work freely, aware of the terms and conditions of their work in advance, and must be able to voluntarily end their employment without any restriction or substantial fines for terminating their employment contract,” and “shall not be required to pay fees or costs associated with their recruitment.”

## **SUPPLIER AUDITS**

While “verification” is designed to identify, assess, and manage supply chain risks, “auditing” refers to activities a company takes to evaluate ongoing supplier compliance with existing company standards for Coerced Labor in its supply chain(s).

Auditors and Audit Rights. Pursuant to our Supplier Code, we reserve the right to request or conduct a Responsible Sourcing audit from or of any Supplier. Specifically, Campbell reserves the right to request an independent third-party audit to verify adherence to the Supplier Code. Suppliers are expected to fully cooperate with Responsible Sourcing audits. Campbell prioritizes collection of audits from Suppliers who are deemed high risk.

Audit Methodology. Responsible Sourcing audits are performed for the purpose of enhancing visibility into a Supplier’s potential risk and on an as-needed basis. During such audits, Campbell inspects for evidence of health and safety concerns, wage and social compliance, forced labor and child labor issues, harassment-free workplace policies, environmental issues, and any other issues germane to compliance with the Supplier Code.

Access to Records. Our standard purchase orders require Suppliers to agree (i) that in addition to all other audit rights, Campbell has the right, with or without notice, and at the Supplier's expense, to audit the facility(ies) where goods are manufactured and examine the books and records of the Supplier (and/or its subcontractors and sub-tier manufacturers and suppliers) to verify compliance with their obligations under the terms and conditions of the purchase order, including compliance with laws, and (ii) that as applicable, Suppliers will procure from each subcontractor and/or sub-tier manufacturer and supplier (if any) such agreements, permissions, and rights as necessary to allow Campbell to perform such audit.

Our Additional Actions to Encourage Supplier Compliance and Accountability.

Anonymous Reporting. Campbell has a whistleblower hotline (called the "Campbell Integrity Hotline") for our employees and third parties with whom we partner to use if they have a concern that relates to improper, illegal, or unethical conduct or if they find themselves in a situation which may lead to a violation of Campbell's policies or applicable laws or regulations. Our Integrity Hotline allows any reporter to remain anonymous. The Hotline is operated by an independent company that specializes in handling such reports. The Hotline is available 24 hours a day, seven days a week, and has translation services available at all times. We are committed to investigating and promptly responding to concerns.

Pursuant to the Supplier Code, moreover, Suppliers are expected to immediately advise Campbell of any issues that may arise related to the Supplier Code, particularly any potential or actual violations. Suppliers may report violations via email or the Integrity Hotline. In order to ensure that the workers within our supply chain have the opportunity to confidentiality report concerns that may be in violation of the Supplier Code, Suppliers are required to make contact information for the Campbell Integrity Hotline available to its workers and inform them that communications may be made on an anonymous basis.

Remediation. The presence of Coerced Labor would mean a violation of the Supplier Code. If Campbell discovers that one of our Suppliers has violated any applicable laws, rules, regulations, or the Supplier Code, we may take corrective action, up to and including canceling any outstanding orders, terminating the business relationship, and/or pursuing legal action. Suppliers are expected to implement recommended corrective action plans and remedy any act of non-compliance in a timely manner. Supplier's failure to implement the recommended corrective actions may result, at Campbell's sole discretion, in the suspension of any purchases from Supplier until the corrective actions have been implemented or termination of the relationship with Supplier. We did not identify any instances of Coerced Labor in our supply chain and therefore did not take any related remedial actions.

Non-Retaliation. We enforce a strict anti-retaliation policy for good faith reporting. In fact, our Supplier Code specifically instructs that a "Supplier shall not retaliate against an employee who speaks out on an issue."

In addition to the foregoing measures, Campbell engages with our Suppliers in various other ways to ensure Responsible Sourcing and to prevent Coerced Labor in our supply chain.

## **SUPPLIER WARRANTIES**

The terms and conditions of Campbell's standard purchase orders include a warranty that Supplier will comply with Campbell's supplier requirements, including its Responsible Sourcing Supplier Code, as well as requirements that the Supplier conduct business in compliance with all applicable laws, rules, and regulations.

## **INTERNAL ACCOUNTABILITY**

Internal Accountability Standards & Compliance Monitoring. Campbell maintains and enforces internal accountability standards for our employees which are set forth in our internal [Code of Business Conduct and Ethics](#). The Code outlines our broad commitment to conducting business with the highest ethical standards and in compliance with all laws, a commitment that has been the strength of our Company for more than 150 years.

Preventative and Corrective Action. We encourage any employee, officer, or director to seek guidance if they have questions or concerns relating to our supply chain or Coerced Labor. Campbell's [Code of Business Conduct and Ethics](#) also requires that individuals report to their immediate supervisor, a member of Campbell Soup Company's management team, Human Resources, the Legal Department, or the Integrity Hotline any violations of the Code, the law, or other Campbell policy. We investigate reports promptly and thoroughly and expect all employees and contractors to cooperate with such investigations fully and candidly. Non-compliance can result in corrective action, up to and including termination of employment. We may also exercise our right to notify the appropriate authorities of potential violations of applicable laws, rules, or regulations.

Measures to Assess Effectiveness. We review the effectiveness of steps taken to prevent Coerced Labor by assessing and evaluating our suppliers and regularly engaging and collaborating with stakeholders. We also regularly review our policies and practices and update them to address identified risks. As we continue to develop our activities, we will consider the need for additional ways to assess the effectiveness of our measures.

## **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 training on our [Code of Business Conduct and Ethics](#). This training, offered in multiple languages, is provided online for salaried employees on an annual basis, and in video format for employees in our manufacturing facilities.

Employees and managers who have direct responsibility for supply chain procurement receive training on the [Responsible Sourcing Supplier Code](#). The training includes an overview of policies related to human rights and content specific to recognizing possible signs of slavery and human trafficking and mitigating risks within the supply chain of our products.

**CONCLUSION**

This Statement articulates the efforts we have taken with respect to our Suppliers to ensure that our expectations around Coerced Labor are met. Given the nature of our business model, our supply chains are complex and constantly evolving. We are committed—despite the complexities—to conducting business in an ethical manner. We will continue to monitor and assess our evolving supply chains and evaluate new programs and initiatives that may support our and our Suppliers’ commitment to supply chains free of Coerced Labor.

**ATTESTATION**

For the purposes of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, this Statement was approved pursuant to subparagraph 11(4)(a) by the Governing Body of Campbell Company of Canada for the fiscal year ending July 30, 2023.

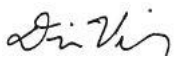
In my capacity as a Director of Campbell Company of Canada, and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Campbell Company of Canada.



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Atul Garg  
Director, Campbell Company of Canada



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David Vincoff  
Director, Campbell Company of Canada