







THE Campbell's COMPANY

Responsible Sourcing Supplier Code







Updated July 2026

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INTRODUCTION

What we do everyday matters. Families of all kinds rely on our foods. Our employees rely on us for a challenging and supportive workplace. Our customers rely on us to help them meet the needs of their customers, profitably. Communities rely on us to help them thrive. And our shareholders rely on us for solid, sustainable returns. We make the biggest impact for all these groups when we set, and meet, high goals—as a business, and as good stewards of the resources we all share.

These are the standards we at Campbell's strive to uphold:

- Put safety above all else—because if we don't, nothing else matters.
- Craft every product around the lives of the real people who rely on it: Delicious, readily available when and where they need it, at a fair price.
- Be open and honest about the food we make—transparent about our ingredients and processes, and inclusive in our engagement with the stakeholders who care.
- Never stop looking for ways to improve the ingredients, taste, quality and accessibility of our food.

It is important to deliver on our commitments to sustainable growth, and in doing so, our Suppliers are an essential part of that journey. We expect our Suppliers to be partners in this effort and to hold themselves to high standards of social and environmental responsibility. Working together, we can create a positive impact across our value chains.

These requirements and expectations follow many of the expectations outlined in the UN Guiding Principles on Business and Human Rights, the Core Conventions of the International Labor Organization (ILO), and the 10 Principles of the United Nations Global Compact. This Code is an extension of our Supply Base Requirements and Expectations Manual and is the foundation of our Responsible Sourcing Program.

SCOPE

This Code applies to The Campbell's Company's direct and indirect suppliers, brokers, co-manufacturers/co-packers, re-packers, special packers, warehouses, distributors, and licensees in all categories, including their parent, subsidiary, or affiliate entities (herein referred to as "Supplier"). Any reference to employee(s) shall be deemed to include temporary labor used or retained. Any reference to Campbell's shall be deemed to include all of its entities worldwide.

Suppliers are expected to adhere to this Code and are responsible for ensuring their practices are consistent with the requirements stated herein. The Campbell's standard purchase order includes terms requiring each Supplier to acknowledge it has reviewed the contents of this Code and agree to comply with the provisions contained therein. In the event of an inconsistency between the Campbell's standard purchase order and a contract executed by Campbell's and the Supplier, the underlying contract usually takes precedence. Supplier is responsible for compliance at the facilities

it uses to produce product supplied to Campbell's. Supplier is required to disclose all facilities that are owned, leased, subcontracted, or used in any form to produce any item supplied to Campbell's. Supplier shall not supply any product or service to Campbell's that it knows to have been produced or procured, in whole or in part, in violation of the terms of this Code.

COMPLIANCE WITH LAWS AND REQUIREMENTS

Supplier must comply with all applicable national and local laws and regulations, including, but not limited to those related to labor, immigration, environmental, business practices, and health and safety for the industry and region in which it operates. We recognize that our Suppliers operate in different areas of the world and in different legal and cultural environments. In all cases, we expect our Suppliers to comply with all applicable legal requirements, including, but not limited to, applicable international sanctions and trade restrictions. Our expectation is that when there is a difference between the terms of the applicable law and the requirements set forth in this Code, Supplier will comply with the more stringent applicable requirement. Failure to comply with applicable law or the requirements stated herein may result, at The Campbell's Company's sole discretion, in the right to suspend any purchases from Supplier.

BUSINESS ETHICS

Supplier shall conduct its business in accordance with the highest standards of ethical behavior and in accordance with all applicable laws and regulations in the countries where supplier operates, materials are sourced, and goods or services are delivered.

- Supplier shall comply with all applicable legal requirements, whether local or foreign, that apply to business operations, including, but not limited to, the U.S. Foreign Corrupt Practices Act.
- Supplier shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of fair competition laws or antitrust laws that govern the jurisdictions in which it conducts business.
- Bribery, kickbacks, corruption, extortion, and similar business practices are prohibited.
- Supplier shall ensure grievance mechanisms are in place which allow for the anonymous reporting and management of grievances.
- Supplier shall not retaliate against an employee who speaks out about an issue.
- All subcontractors must be disclosed and engagement in any unauthorized subcontracting is prohibited.
- Supplier shall not offer gifts or anything of value or otherwise not in compliance with Campbell's policies to Campbell's associates, or for the purpose of an advantage such as obtaining or retaining business or preferential treatment.
- Suppliers shall not enter into transactions with Campbell's employees that may be or appear to be a conflict of interest.
- Supplier shall take appropriate measures to safeguard and maintain confidential and proprietary information of Campbell's and shall use such information only for the purposes authorized for use by Campbell's.

CHILD LABOR

Supplier shall not employ or engage, directly or indirectly, such as through contractors or temporary employee providers, workers under 16 years of age (or 14 years of age where consistent with International Labor Organization Minimum Age Convention No. 138 and the local law allows such exception, including, but not limited to exceptions for participation in a family business or on a farm owned or operated by their parents) or under the age for completing compulsory education.

- Supplier shall maintain documentation of each individual's date of birth and must be able to legitimately confirm each individual's age.
- Supplier shall ensure that workers under 18, including, but not limited to, contractors or temporary employees, do not work in hazardous conditions or in a manner that unreasonably interferes with their education. Workers under 18 should not work during night hours.

VOLUNTARY EMPLOYMENT/ FORCED LABOR

All labor must be voluntary. Supplier shall not use, employ, or engage, directly or indirectly, such as through contractors or temporary employee providers, any slave, bonded, forced, or indentured labor, or engage in any other forms of compulsory labor, or any other forms of slavery or human trafficking.

- The ability of workers to move freely shall not be restricted by supplier through abuse, threats, or practices such as retention of passports or valuable possessions in an unlawful manner or without their consent.
- Workers 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.
- Workers shall not be required to pay fees or costs associated with their recruitment.

PRISON LABOR

Supplier shall not use, employ, or engage, directly or indirectly, such as through contractors or temporary employee providers, any prison labor.

ABUSE, HARASSMENT, AND DISCIPLINARY ACTION

All employees are to be treated with respect and dignity and in compliance with local legislation and disciplinary practices.

- Any form of psychological, physical, sexual, or verbal abuse, intimidation, threat, or harassment, or any other inhumane or degrading treatment will not be tolerated.
- Supplier shall not establish monetary fines or take deductions from wages for disciplinary reasons.

FAIR AND EQUAL TREATMENT

Supplier shall ensure fair and equal treatment of all employees. Supplier shall not discriminate on the grounds of criteria such as race, color, caste, religion, gender, age, disability, marital status, sexual orientation, political affiliation, union membership, maternity, or any other characteristic protected by applicable law.

- Supplier shall comply with ILO Equal Remuneration Conventions (No. 100) and ILO Discrimination Convention (No. 111).
- Supplier's terms and conditions of employment, including hiring, training, working conditions, compensation, benefits, promotions, discipline, termination, or retirement shall be based on the individual's qualifications, performance, skills, and experience.
- Supplier shall not conduct medical tests on employees that can be used to discriminate for an unlawful reason (*e.g.*, pregnancy testing).

COMPENSATION AND BENEFITS

Supplier shall fairly compensate all employees with wages, overtime premiums, and benefits that meet or exceed all applicable laws or collective agreements. Suppliers are encouraged to provide wages that are sufficient to meet workers' basic needs and provide some discretionary income for workers and their families.

- Supplier shall ensure that wages paid for all hours worked meet at least the legal minimum wage or the local industry minimum standards for compensation, whichever is higher.
- Supplier shall pay employees on time, in accordance with legal requirements; in all circumstances, wages must be paid on at least a monthly basis.
- Supplier shall provide each employee with an itemized wage statement upon wage payment. The statement should include, at a minimum, amount of pay, pay period, rate of pay, regular and overtime hours worked, deductions and benefits, if applicable.
- Supplier shall provide all legally mandated benefits such as public holidays, paid vacation/annual leave, sick days, and maternity/paternity/family leave.

WORKING HOURS

Suppliers must comply with all applicable laws regarding regular working hours, rest periods, and overtime hours.

- Supplier shall provide meal and rest periods during and between shifts in accordance with applicable law.
- Workers shall not be forced to exceed the applicable legal limit of regular working hours and overtime. No mandatory excess overtime is allowed unless local law provides otherwise.

HIRING PRACTICES

Suppliers must utilize ethical hiring practices that include verification of a worker's age and legal right to work in the country.

- Suppliers must verify the age of each worker before commencement of employment.
- At the time of hiring, employees are to be informed in writing of the basic terms of employment in a language understood by the employee.
- If foreign or migrant workers are engaged, they are to be employed in full compliance with the labor and immigration laws of the host country.

FREEDOM OF ASSOCIATION

Supplier shall respect the right of employees to form and join trade unions and bargain collectively in a lawful and peaceful manner, subject to and in accordance with applicable law.

- Supplier shall not discriminate based on affiliation or non-affiliation.
- Supplier shall not allow unlawful interference by management in the organization of workers.

HEALTH AND SAFETY

Supplier shall provide workers with a safe, clean, and healthy work environment that complies with all applicable laws pertaining to health and safety in the workplace.

- Supplier shall provide access to potable drinking water, adequate lighting, safe temperature, ventilation, and sanitation. Adequate washing and toilet facilities shall be provided for employees, regardless of gender.
- Appropriate emergency exits including easily accessible exit doors and stairways shall be available. These exits should be clearly marked and free of any obstructions and not locked.
- Facilities must have fire extinguishing equipment and fire alarms that are adequate for the hazard level of the facility's operations.
- Supplier shall ensure that appropriate emergency preparedness plans are in place, including emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities.
- Supplier shall provide all appropriate personal protection equipment.
- Supplier shall maintain records of health and safety training and accidents and injuries at the workplace.
- When provided by Supplier, dormitory facilities shall be constructed and maintained in accordance with applicable laws and regulations. All dormitory buildings shall be clean and safe, have appropriate clean toilets and shower facilities, access to potable water, and sanitary food preparation and storage, and adequate heat and ventilation. Workers shall be able to enter and leave the dormitory buildings freely at any hour.

ENVIRONMENTAL

Suppliers shall ensure that manufacturing facilities and operations comply with all applicable environmental laws, including those related to waste disposal (including hazardous waste), air emissions, greenhouse gas (GHG) emissions, wastewater and effluents, and toxic substances. Supplier is encouraged to go above and beyond the legal requirements and implement plans focused on reducing the use of natural resources.

- Supplier shall obtain and keep current all required environmental permits.
- Supplier shall ensure the safe handling, movement, storage, and disposal of hazardous materials.
- Supplier is encouraged to optimize its consumption of natural resources, including energy and water, and demonstrate sound measures to prevent pollution and generation of solid waste, wastewater, and air emissions.
- Supplier shall engage with Campbell on climate-related topics upon request. Required engagements may include providing product carbon footprint data, eliminating exposure to key risks, and identifying opportunities to reduce impacts.
- Supplier is encouraged to have sustainable procurement policies in place for its own suppliers.

ANIMAL WELFARE

Campbell is committed to the humane treatment of animals, and animal welfare is a key part of our vision for an ethical and responsible supply chain. Suppliers are required to implement humane procedures to prevent the mistreatment of animals at all times, including when they are raised, cared for, transported, and processed. At a minimum, Suppliers are expected to provide an environment that is consistent with the "five freedoms" of animal welfare, which are defined as:

1. Freedom from thirst, hunger, and malnutrition.
2. Freedom from discomfort.
3. Freedom from pain, injury, and disease.
4. Freedom to express normal behavior.
5. Freedom from fear and distress.

Suppliers also should refer to our Animal Welfare Guidelines.

AGRICULTURE PRACTICES

Campbell's recognizes the importance of resilient supply chains that safeguard natural resources to ensure that we can continue to deliver affordable, high-quality foods for future generations. We have a long-standing history of working closely with many of our farmers to ensure the production of high-

quality crops. Building on this legacy and understanding the increasing pressures on the global food supply from factors such as population growth and climate change, we partner with farmers and other suppliers to develop and improve practices in sustainable agriculture.

The standards outlined in this section summarize the expectations for agricultural producers who grow crops or raise animals for our supply chain and, by extension, for our ingredient suppliers who source these agricultural raw materials. Campbell's understands that sustainable agriculture may pose challenges for suppliers and that the journey toward sustainable practices is a continuous one. We aim to work collaboratively with our suppliers to achieve a more sustainable agricultural supply chain.

Below are The Campbell's Company's expectations for soil management, nutrient management, crop protection, water management, waste management, ecosystem conservation, and climate resiliency practices. We expect suppliers of our priority ingredients to complete an annual self-assessment for these issues.

Soil Management

Suppliers should implement measures to protect and improve soils, including preventing erosion and nutrient degradation, increasing carbon storage, and promoting soil biodiversity. This may be achieved through regenerative practices such as crop rotation, cover crops, no-till or minimum-till, and adding compost and/or organic matter.

Nutrient Management

Suppliers should have updated and verified nutrient management plans that are implemented to optimize inputs and minimize pollution from run-off. Suppliers should work toward implementing precision application that is informed by soil and tissue analyses, crop needs, and weather conditions. Suppliers are encouraged to use accredited decision-support tools that will drive nutrient optimization.

Crop Protection – Pest, Weed, and Disease Management

Suppliers shall comply with all regulations and label requirements for safe and proper use of all agrochemicals. Farms that directly contract with Campbell's shall make their application records readily available. Suppliers should try to use integrated pest management techniques, such as regular crop scouting by a certified scout, preventative and non-chemical controls, economic thresholds to guide any necessary pesticide applications, and practices to minimize human and environmental risks.

Water Management

Suppliers should work to ensure the long-term sustainability of water resources and utilize water conservation techniques. Practices such as drip irrigation, rainwater collection, and re-using water where possible are strongly encouraged. For irrigated crops, suppliers should monitor and record water use on a per-field basis to track usage and use crop/field need-based decision tools (e.g. evapotranspiration monitoring, soil moisture sensors) to inform irrigation decisions.

Conservation of ecosystems and biodiversity

Suppliers should protect and encourage natural habitats, native species and biodiversity, and ecosystem services such as pollinators on farms. Suppliers are encouraged to leverage public or private cost share or grant programs to make conservation measures more feasible.

Climate resiliency

Suppliers should maximize energy efficiency and, where possible, seek to use renewable energy. Suppliers should use agricultural practices and tools to reduce their greenhouse gas emissions on-farm. Suppliers that do not directly farm themselves should be measuring and disclosing greenhouse gas emissions yearly and are encouraged to set reduction targets.

Waste Management

Animal product suppliers shall not use animal-derived feed and should maximize use of crop and vegetative supply chain byproduct for feed. Suppliers should responsibly manage manure to minimize pollution or contamination. Suppliers of animals should implement air emission reduction techniques to minimize air pollution and ensure a safe environment for surrounding communities. Efforts should be undertaken to eliminate food and crop waste from suppliers' operations, including in-field.

Worker Health, Safety, and Livelihoods

Suppliers and their growing operations should have verifiable, site-based environmental, health, and safety programs to protect farmworkers and the community from adverse health effects related to aerial drift and exposure during application.

ADDITIONAL STANDARDS

We may also develop more detailed guidelines for specific direct inputs that may be presented alongside this document as a further requirement for selected Suppliers, or for those ingredients we deem as key to our business. Suppliers should review the Supplier Requirements and Responsible Sourcing information available online.

OTHER RESPONSIBILITIES

COMMUNICATION OF THIS CODE

Supplier is expected to inform workers about the requirements and expectations outlined in this Code. How Supplier chooses to do so may include prominently posting the Code in the workplace in an area accessible to workers, conducting group or individual meetings or trainings to review and explain the requirements and expectations stated herein, or communicating via online channels such as a company intranet.

REPORTING VIOLATIONS

Supplier is expected to immediately advise Campbell's of any issues that may arise related to this Code, particularly any violations that may occur. You may report a violation via e-mail using the following address: responsible_sourcing@campbellsoup.com. Anonymous reports may also be made via our Integrity Hotline, which is operated by an independent company that specializes in handling calls of this type. It operates 24 hours a day, seven days a week, and has translation services available at all times. Please see Appendix A for instructions for using our Integrity Hotline.

We also believe that the workers within our supply chain should have the opportunity to confidentially report concerns that may be in violation with this Code. Supplier shall make the above contact information available to its workers and inform them that communications may be made on an anonymous basis.

COMPLIANCE MONITORING

Campbell's will use a variety of factors and tools to determine a Supplier's potential for social and environmental risks. Based on the initial determination of risk, Campbell's may require Supplier to complete a self-assessment questionnaire.

Suppliers also may be required to undergo a Responsible Sourcing audit, and Campbell's reserves the right to request an independent third-party audit to verify adherence to this Code. We will be willing to discuss mutual recognition of audits in accordance with globally-recognized frameworks such as SMETA and by fully-qualified organizations. When Campbell's determines an audit is required, it is expected that Supplier will fully cooperate.

Suppliers are expected to implement recommended corrective action plans and remedy any act of non-compliance in a timely manner. The time frame for any corrective action or re-evaluation may be extended at The Campbell's Company's sole discretion. Supplier's failure to implement the recommended corrective actions may result, at The Campbell's Company's sole discretion, in the right to suspend any purchases from Supplier until the corrective actions have been implemented or to terminate the relationship with Supplier.

Suppliers are responsible for educating and monitoring their suppliers, vendors, subcontractors and independent contractors. Any fees related to the audits or Supplier self-assessment questionnaires will be the responsibility of the Supplier.

TRANSPARENCY AND TRACEABILITY

Our transparent approach to business is important to our stakeholders and we expect the same of our suppliers. If requested, Supplier shall disclose the geographical location of facilities producing raw materials for Campbell's, as well as the origin of raw materials within the Suppliers' own direct supply chain. We may also ask Suppliers to provide mapping back to the origin of materials to assess upstream supply chain traceability and compliance.

REFERENCES

The following sources were used in the preparation of this Responsible Sourcing Supplier Code and provide additional information that may be useful to Supplier:

International Labour Organization Freedom of Association and Protection of the Right to Organise Convention (No. 87)

International Labour Organization Right to Organise and Collective Bargaining Convention (No. 98)

International Labour Organization Forced Labour Convention (No. 29)

International Labour Organization Abolition of Forced Labour Convention (No. 105)

International Labour Organization Minimum Age Convention (No. 138)

International Labour Organization Worst Forms of Child Labour (No. 182)

International Labour Organization Equal Remuneration Convention (No. 100)

International Labour Organization Discrimination (Employment and Occupation) Convention (No. 111)

ILO Private Employment Agencies Convention No. 181

United Nations Framework and Guiding Principles on Business and Human Rights

United Nations Global Compact Guiding Principles

OECD Guidelines for Multinational Enterprises

THE Campbell's COMPANY

Information about *the Campbell's Integrity Hotline*

The Campbell's Integrity Hotline (the "Hotline") is operated by an independent company that specializes in handling calls of this type. It operates 24 hours a day, seven days a week, and has translation services available at all times.

- **In the U.S. and Canada** – Call the Hotline toll-free at **1-800-210-2173**.

- **In Mexico –** Please follow the instructions below to place a toll-free call:

Make sure you have an outside line. (If you are using a public phone, make sure it can be used to make international calls.)

Step 1: Call either **001-800-658-5454** (Spanish speaking operator) or **01-800-288-2872** (English speaking operator).
Step 2: When you hear the English-language voice prompt, enter the toll-free number **(800) 210-2173**. (DO NOT press "1" or "0" before dialing the telephone number.)
Step 3: The call will be connected to the Hotline.

You may also report concerns through the Hotline in writing from any computer with access to the Internet at campbells.ethicspoint.com.

Can I Make a Report Anonymously?

Yes. If you wish, you may make a report to the Hotline anonymously. The Hotline assigns a tracking number to every caller so that those who do not wish to give their names can still check back to receive a response or provide additional information. Of course, providing your name often will assist in the investigation of the matter you are reporting. As explained below, Campbell's prohibits retaliation against anyone who raises a concern in good faith.

We will treat your report confidentially to the extent possible, consistent with legal obligations and the best interests of all concerned.

Every effort will be made to respond quickly to your report. We will investigate the issues and, if appropriate, take corrective action.

We Will Not Tolerate Retaliation

Any employee who seeks advice, raises a concern, or reports a possible violation in good faith is following the Campbell's Code of Business Conduct and Ethics. Campbell's strictly prohibits and will not tolerate retaliation of any kind against anyone who reports a concern in good faith or who helps to investigate or resolve it. Anyone engaging in retaliatory conduct will be subject to disciplinary action, which may include termination of employment. If you think that you or someone you know has been retaliated against for raising a compliance or integrity issue, immediately contact any member of the Legal Department or the Hotline.