



## **Discrimination, Harassment and Retaliation Prevention Policy**

The principles of equal employment opportunity, anti-discrimination, and anti-harassment correlate with our Purpose and our Values, as well as our desire to create a workforce that reflects the diversity of the consumers we serve. We want to attract and retain bright and talented people from diverse backgrounds and experiences, producing and complementing an effective and successful Campbell team.

### **Equal Employment Opportunity**

To that end, Campbell Soup Company, together with its subsidiaries and affiliated entities, is an equal opportunity employer and prohibits unlawful discrimination against applicants for employment and employees on the basis of **race, color, sex, gender, sexual orientation, gender identity, gender expression, national origin, ancestry, citizenship, marital status, military or veteran status, physical or mental disability, medical condition, age, religion, genetic information or any other classification protected by federal, state, or local law.**

The Company is committed to equal opportunity in all aspects of the employment relationship including, but not limited to, recruiting, hiring, training, promotion, compensation, transfer, layoff, recall, and all other terms and conditions of employment.

### **Prohibition of Sexual and Other Workplace Harassment**

The Company's commitment to equal employment opportunity and providing a workplace free from discrimination includes prohibiting any form of harassment or bullying in the workplace or directed at its employees (whether by co-workers, supervisors, managers, or third parties with whom employees come into contact) wherever they may be working, including off-site meetings and business-related social functions. This includes not only sexual harassment, but also harassment or bullying on the basis of any other legally protected classification, including all of the classifications listed above.

Sexual and other workplace harassment is a form of employee misconduct. By way of illustration only, the following are some examples of behaviors and/or communications which are inappropriate and as such prohibited, regardless of whether they are illegal, as they may contribute towards creating an intimidating, hostile, or offensive working environment:

- Requiring sex as a condition of employment or any term or benefit of employment or punishing any person with regard to any term, condition or benefit of employment because he or she did not submit to sexual advances, or making any employment decision based on a person's submission to or refusal to submit to sexual advances.
- Sexual or suggestive pictures, photos, cartoons, e-mails, Internet web sites, jokes, slurs, profanity, nicknames, conversations, questions, innuendo (verbal and non-verbal), objects, or symbols; whistling, leering, or improper gestures or offensive remarks; frequent and/or inappropriate comments on appearance; repeated requests for dates; intrusive questions seeking personal details about one's marriage or relationships; excessive and/or inappropriate and/or unwelcome touching; unwelcome flirtations; and other inappropriate behaviors and/or communications of a sexual, suggestive, or biased nature.
- Pictures, photos, cartoons, e-mails, Internet web sites, jokes, slurs, profanity, epithets,

nicknames, conversations, questions, objects, symbols, imitations, and other communications/behaviors which reflect negatively upon, stereotype or disparage any legally protected group (for example only, any such items based on age, race, or national origin).

### **Reporting Procedure**

Any employee or applicant who believes that he or she has been subjected to acts of discrimination, harassment, bullying or otherwise inappropriate conduct by any employee or non-employee is strongly encouraged to report it promptly. A report can be made to the employee's supervisor or manager, or the Human Resources Department at the employee's location. A report does not have to be made in writing and no specific complaint form is required. Alternatively, employees also may call the Company's toll-free Integrity Hotline\* to report suspected harassment, discrimination, bullying, or retaliation. **Individuals should approach one of these designated representatives with whom they feel most comfortable speaking, for whatever reason, and should not feel obligated to report their complaints to their immediate supervisor or necessarily follow any formal chain of command.** Supervisors or managers who receive such a report are to refer the report immediately to the Human Resources Department for investigation and response.

### **Internal Investigations, Confidentiality, and Discipline**

When a report is received, the Company will undertake a prompt, thorough and impartial investigation as appropriate under the circumstances. Confidentiality will be maintained throughout the investigation process to the extent practical and consistent with the Company's need to undertake an appropriate investigation. If misconduct is found to have occurred, the Company will take appropriate remedial measures. Individuals found to have engaged in discrimination, harassment, bullying, retaliation, or other inappropriate conduct (even if not illegal) and managers and/or supervisors who knowingly allow such behavior to continue will be disciplined as appropriate, up to and including dismissal.

### **Prohibition of Retaliation**

The Company will neither engage in nor tolerate retaliation against any individual who makes a report of discrimination, harassment or bullying or who cooperates in such an investigation. Any incident of retaliation should be promptly reported using the reporting procedure described above.

---

\* The **Campbell Soup Company Integrity Hotline** can be accessed toll-free at 800-210-2173 or by a Web submission at [campbellsoup.ethicspoint.com](http://campbellsoup.ethicspoint.com).