



Campbell Soup Company Anti-Slavery and Human Trafficking Statement Updated October 2018

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 statutes or regulations. 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, Garden Fresh Gourmet, Pacific Foods, Snyder’s of Hanover, Lance, Kettle Brand, KETTLE Chips, Cape Cod, Snack Factory Pretzel Crisps, Pop Secret, Emerald, Late July* and other brand names.

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 [Code of Business Conduct and Ethics](#) 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 [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](#) 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. Compliance with the Code is a requirement outlined in our supplier contracts.

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 Sustainability Steering Committee, which is overseen by the Chief Sustainability Officer and the Sr. VP of Supply Chain provide oversight of global Responsible Sourcing efforts, including human rights due diligence. The Chief Sustainability Officer and the Sr. VP of Supply Chain report directly to the President and CEO. Campbell's Director of Procurement Corporate Responsibility, who reports to the VP Procurement Business Operations and indirectly to the Chief Sustainability Officer is overseeing the implementation of the Company's Responsible Sourcing Program. Campbell's Board of Directors receives an update on the progress of our Responsible Sourcing Program annually. 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 published in May 2017 and has been rolled out to our suppliers. This fiscal year, we began implementation of the Code with audits required for our high-risk suppliers of our priority raw materials. We will continue to advance compliance beyond high-risk suppliers of priority ingredients in Fiscal Year 2019.
- **Risk Assessment.** As described below, this fiscal year we completed 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 2018 we worked with The Sustainability Consortium to conduct a risk analysis of our ingredient supply base. In addition, we completed an assessment of our global supply base to segment our suppliers based on risk. The outcome of these assessments also led to the development of priority focus areas where we believe we can have the most impact.

Our Effectiveness in Combating Slavery and Human Trafficking

We evaluate slavery and human trafficking risks as part of some of our Responsible Sourcing Program compliance. Our suppliers are held accountable to the guidelines outlined in our Responsible Sourcing Supplier Code. Suppliers of priority raw materials rated as high-risk are required to supply an acceptable third-party conducted audit. As we continue the implementation of our Responsible Sourcing Program, we will expand this requirement beyond high-risk suppliers of priority raw materials.

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.

This fiscal year, all employees and managers who have direct responsibility for supply chain procurement were required to complete training on the Responsible Sourcing Supplier Code. The training included 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. 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 Corporate [Responsibility](#) Report or by visiting our [Supplier Portal](#).