



Conagra Brands
Research & Development
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IN RE: RSPO Certified Sustainable Palm Oil

ConAgra Foods uses palm oil as a functional ingredient in several of our branded and food service products due to its unique properties. We purchase palm oil from U.S.-based suppliers — some run integrated operations that cultivate, harvest and process the oil, and others act as commodities traders who purchase and distribute palm oil that has been cultivated by other parties. Over the past several years, we've become increasingly aware of the potential environmental and social risks associated with the cultivation, harvesting and processing of palm oil, and we have taken steps to improve the sustainability of our palm oil supply chain.

ConAgra Foods is a member of the Roundtable on Sustainable Palm Oil (RSPO), an organization dedicated to promoting the growth and use of sustainable palm oil products through credible global standards and the engagement of stakeholders. We support the principles of the RSPO and RSPO efforts to encourage and certify sustainable palm oil production practices. To help ensure our purchases do not contribute to the deforestation of the world's rainforests or negatively impact the communities that depend on them, we have purchased GreenPalm certificates for all of our purchased palm oil and have begun to move to the Mass Balance system.

We are also working with our suppliers to support the development of a sustainable, cost-effective market for palm oil to prevent the deforestation of lands for the purpose of developing new palm plantations. We will purchase palm oil only from RSPO members — with preference for purchasing RSPO certified sustainable palm oil. We are dedicated to sourcing palm oil only from suppliers whose landholdings and operations meet the following principles:

- Only legal sources that adhere to all relevant international, national and local legislation and regulation.
- No development on high conservation value landscapes or high carbon stock (HCS) forests. While the HCS methodology is being refined by field testing and science review, new plantings should only be established in low carbon stock areas.
- No development on peat lands regardless of depth and use of best management practices for existing plantations on peat.

- No burning in the preparation of new plantings, re-plantings or other developments and the progressive reduction of GHG emissions.
- Compliance with our Supplier Code of Conduct which describes our expectations in matters including food safety and quality, forced labor, child labor, freedom of association and collective bargaining, discrimination and harassment, wages and benefits, work hours and overtime, health and safety, environment and anti-corruption.
- Respect Land Tenure Rights, including the rights of indigenous and local communities to give or withhold their Free, Prior and Informed Consent to all new development or operations on lands to which they hold legal, communal or customary rights.
- Prevention and resolution of social and/or land conflicts through an open, transparent and consultative process.
- Traceability to the extraction mill and validation of fresh fruit bunches to the plantation estate.

On our journey to sourcing RSPO Certified Sustainable Palm Oil, during FY16, we secured supply chain certification for five of our manufacturing facilities and have begun sourcing Mass Balance certified oils. By end of calendar year 2016, we will have secured supply chain certification for 90 percent of our production facilities that use palm oil. Certification of these facilities will enable use of Mass Balance certified oil for about 93 percent of our consumption. We will continue to engage with both external and internal stakeholders to promote and encourage the use of RSPO Certified Sustainable Palm Oil.

Sincerely,



Anga E. Smith
Sr. Regulatory Affairs Specialist
International