



## THE J. M. SMUCKER COMPANY

### California Transparency in Supply Chains Act Disclosure

For more than 120 years, The J.M. Smucker Company has been guided by our *Basic Beliefs* — values and principles that guide both strategic decisions and daily behavior. These *Basic Beliefs* regarding quality, people, ethics, growth, and independence have served as a strong foundation throughout our history and continue to be the basis for how we run the Company.

As extensions of our business, we expect that our suppliers practice similar values and standards of conduct that we ask of our own Company.

We have taken important steps in enhancing transparency in our supply chain with updates to our Global Supplier Code of Conduct (“Supplier Code”) and the introduction of our Global Responsible Sourcing Program (“Program”). We expect every supplier to meet the standards of the Supplier Code and the requirements of our Program.

Our efforts to mitigate risks of human trafficking and slavery in the supply chain include:

#### **Verification**

Through our Program, we conduct periodic risk assessments of supplier facilities. Suppliers complete online questionnaires to verify that their facilities meet the standards in our Supplier Code. Facilities are assigned a risk rating, based on the responses to the questionnaire and human rights data from public sources.

We assess and manage potential risks related to the presence of labor brokers or third-party recruiters, particularly in our seafood supply chain. As a member of the Seafood Task Force, we make sure that our seafood suppliers are fully engaged in the Task Force’s activities pertaining to human rights and responsible recruitment in their supply chains.

#### **Auditing**

In alignment with our Program, we require that supplier facilities with medium and high-risk rating undergo announced third-party SMETA 2-pillar audits. Suppliers must complete any corrective actions resulting from these audits in order to continue doing business with Smucker.

In addition, we conducted third-party SMETA 2-pillar audits in three Smucker-owned manufacturing facilities. We intend to complete similar audits of our remaining sites in the next 2-3 years.

### **Certification**

Procurement agreements issued by our company require that direct suppliers do not participate in human trafficking, and do not employ children, prison labor, indentured labor, bonded labor or use corporal punishment or other forms of mental and physical coercion as a form of discipline.

Our Procurement team is in the process of incorporating the requirements of our Responsible Sourcing Program when evaluating prospective suppliers.

### **Internal Accountability**

Compliance with our company standards regarding slavery and human trafficking is the responsibility of every Smucker employee and contractor acting on our behalf and is a condition of their employment or contract. Employees and contractors are expected to speak up if they become aware of conduct that is inconsistent with the Supplier Code.

Smucker employees and contractors, and workers in our supply chain may report anonymously to Smucker's Voice Line. Reports may be submitted globally through the telephone or online. Smucker's Voice Line is operated by an independent company 24 hours a day, seven days a week, and has translation services available at all times.

Smucker prohibits retaliation against employees and contractors who report violations of the Supplier Code, and requires suppliers to prohibit retaliatory, threatening or harassing acts against anyone who in good faith raises concern or reports misconduct.

### **Training**

We have conducted introductory training on our Supplier Code and Responsible Sourcing Program with selected suppliers and employees in our Procurement organization.

In the next few months, we will make relevant online training available to Smucker salaried employees and suppliers.

As we develop new business strategies, we will continue to monitor the risk of human trafficking and slavery in our supply chain. We will also implement new efforts that may be necessary to protecting human rights in our supply chain.

March, 2020.