



THE J.M. SMUCKER Co

California Transparency in Supply Chains Act Disclosure

For more than 125 years, The J. M. Smucker Company (the “Company,” “Smucker,” “we,” or “our”) has been guided by our Basic Beliefs — values and principles that guide both strategic decisions and daily behavior. These Basic Beliefs have served as a strong foundation throughout our history and continue to be the basis for how we run the Company.

Since the introduction of the Company’s Responsible Sourcing Program (“Program”) in 2018, we have taken additional steps to enhance transparency in our supply chain. The [Smucker Global Supplier Code of Conduct](#) (“Supplier Code”) reiterates our commitment to protecting the human rights of all the workers in our supply chain, including our own employees. We expect every supplier to meet the standards of our 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 assessments to evaluate the risks of forced labor and child labor in our supply chains. We identify high-risk facilities based on several factors, including country location, commodity type, and publicly known social and environmental risks. We also rely on various sources of relevant information, including the U.S. Department of Labor’s Bureau of International Labor Affairs (ILAB) “List of Goods Produced by Child Labor or Forced Labor,” the U.S. Department of State’s Human Rights Reports, Verite’s Responsible Sourcing Tool, and Transparency International’s Corruption Perceptions Index.

As a member of the Seafood Task Force (“Task Force”), we actively participate in the Task Force’s responsible recruitment initiatives to mitigate risks related to the presence of labor brokers or third-party recruiters in Thailand’s seafood supply chain. In alignment with the Task Force’s guidelines, we engage our direct suppliers to conduct mapping and ensure traceability of our tuna supply chain up to the fishing vessel. We also collaborate with our suppliers’ programs to improve the work conditions of vessel workers.

In the coffee supply chain, we are utilizing an innovative 3rd party verification approach to assess sustainability and human rights risks. Enveritas, an independent global non-profit with a mission to “end global poverty in the coffee sector by 2030”, conducts annual randomized and unannounced surveys across Smucker sourcing regions. Using this data, they are able to recommend initiatives that aim to improve the overall well-being of coffee-producing communities and remediate weaknesses.



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Auditing

We require that high-risk supplier facilities complete announced third-party social audits at least every three years. The audits are intended to evaluate compliance with Smucker standards for trafficking and slavery in supply chains. Suppliers may choose from a list of pre-approved social audit schemes. To meet our social audit requirement, supplier facilities must complete all corrective actions resulting from the audit.

In connection with our Program's mutual recognition model, we may accept social audits that suppliers complete for other parties, if they meet certain requirements.

Certification

The Company's procurement agreements require that suppliers be in full compliance with all applicable legal and regulatory requirements and the Supplier Code. These agreements specifically prohibit suppliers from participating in human trafficking; employing children, prison labor, indentured labor, or bonded labor; or using corporal punishment or other forms of mental and physical coercion as a form of discipline.

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 our Basic Beliefs and Supplier Code.

The [Smucker Integrity Portal](#) is provided to employees, customers, contractors, vendors, and others in a business relationship with Smucker who wish to ask questions, seek clarification, or report potential concerns or violations of law, Supplier Code, or internal Company policies. The Integrity Portal is operated by an independent firm, 24 hours a day, seven days a week, with translation services available at all times. Reports may be submitted anonymously through the telephone or online.

Smucker prohibits retaliation against individuals who report violations and requires suppliers to prohibit retaliatory, threatening, or harassing acts against anyone who in good faith raises concerns or reports misconduct.

Training

All Smucker employees are required to complete awareness training on human rights issues, including forced labor and child labor. Management and employees with direct responsibility for supply chain management are expected to complete additional training on the prevention of human trafficking in our supply chain.