

RESPONSIBLE SOURCING PRACTICES

The J.M. Smucker Company is committed to conducting business in an environmentally and socially responsible manner. We seek suppliers that have a strategic fit with our business; possess a cultural fit that supports our *Basic Beliefs*; and meet our operational excellence standards for quality, safety, delivery, and location. We encourage our suppliers to operate transparently, responsibly, and sustainably in order to minimize social and environmental risk across our supply chain. We expect our suppliers to comply with our high ethical standards.

The Ethics and Compliance team will lead the design, implementation, and administration efforts for our responsible sourcing practices, which address social compliance requirements for suppliers and define our social compliance risk assessment methodology. The Ethics and Compliance team reports to the Senior Vice President, General Counsel and Secretary and will have access, and provide periodic updates, to the executive leadership team and, if needed, the Board of Directors. The goal is to reduce our environmental impact, protect workers' rights in our global supply chain, and support the communities in which we operate throughout the world. Our relationships with suppliers are particularly important, given that they directly impact our ability to meet the product quality, safety and performance expectations of our consumers and customers. As important business partners, our suppliers must share our commitment to operate transparently, responsibly, and ethically.

Our Responsible Sourcing Practices are grounded in our *Basic Beliefs* of *Quality*, *People*, *Ethics*, *Growth*, and *Independence* and reflects our consideration of economic, environmental, and social impact.

- **Economic** Our most important corporate responsibility is the long-term economic viability of our business. Our strong financial foundation ensures we have the resources to reinvest in making our business, people, and communities stronger.
- **Planet** Environmental responsibility is an inherent part of our heritage, and we incorporate environmental considerations into our decision-making processes throughout our organization including the operations of our facilities, the development of new products, and our commitment to responsible sourcing practices.
- **Social** As a good corporate citizen, we have always believed in our responsibility to support organizations, projects, and programs that contribute to the well-being of our communities.

Our Global Supplier Code of Conduct sets minimum expectations for suppliers who conduct business with Smucker. It addresses general business practices, labor practices and human rights, and environmental management. Suppliers will be required to be in compliance (and to represent that, to the best of their knowledge, their subcontractors are in compliance) with our Global Supplier Code of Conduct in writing by including a specific clause in our procurement policy, master purchase agreements, and purchase order terms and conditions.

Training curriculum will be developed to inform the entire company of our responsible sourcing practices and targeted training will be conducted for procurement and quality assurance teams. We will also communicate program expectations to suppliers, including adherence to the Global Supplier Code of Conduct, verification procedures ranging from self-questionnaires to onsite assessments, required corrective (and preventive) action, and supplier ratings on key social compliance metrics.

Social compliance risk assessments will be conducted on an annual basis. Smucker will segment its suppliers according to risk and prioritize the assessment process from high to low risk to verify that suppliers are complying with our Global Supplier Code of Conduct. Risk will be assessed and assigned based on responses to questionnaires and external data sources related to geographic and commodity risks. High and medium risk suppliers will be subject to on-site audits to determine their level of compliance. Corrective action plans will be implemented for any findings. Suppliers who do not continually meet our standards or complete corrective actions will not be considered a supplier of choice and will be at risk of losing the opportunity to conduct business with Smucker.

Our annual Corporate Responsibility Report will be used to keep stakeholders informed on the progress of our responsible sourcing practices.